

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONNA CURLING, et al.,	)	
	)	
Plaintiffs,	)	
	)	CIVIL FILE ACTION
vs.	)	
	)	NO. 1:17-cv-02989-AT
	)	
BRAD RAFFENSPERGER, et al.,	)	
	)	
Defendants.	)	

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VIDEOTAPED DEPOSITION OF

DOMINIC OLOMO

September 4, 2020

10:05 a.m.

Via Zoom Videoconferencing

Reported by: Marsi Koehl, CCR-B-2424



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Deposition of  
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9/4/2020

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C O N T E N T S		
E X A M I N A T I O N		
		Page
Examination by Mr. McGuire.....		5
E X H I B I T S		
Plaintiff's Exhibit No.	Description	Page
Exhibit 1	Attachment A to Subpoena	10
Exhibit 2	Photographs	90
(Original exhibits attached to original transcript.)		

\*\*\*\*\* C E R T I F I E D \*\*\*\*\*

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

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14  
15  
16  
17  
18

19 (Pursuant to OGCA 15-14-37 (a) and (b) a  
20 written disclosure statement was submitted by the  
21 court reporter and is attached hereto.)  
22  
23  
24  
25

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Deposition of  
DOMINIC OLOMO

9/4/2020

P R O C E E D I N G S

EXAMINATION

BY MR. MCGUIRE:

Q. Good morning, Mr. Olomo. Hi. I'm Robert McGuire. I represent the Coalition plaintiffs in this lawsuit. I am going to be asking you some questions today.

And I guess let's begin just with your name and -- your full name, and if you could spell your last name, please.

A. My name is Dominic Olomo. Last name O-L-O-M-O.

Q. Have you ever been deposed before, Mr. Olomo?

A. No.

Q. Have you ever been -- given testimony in any kind of legal proceeding at all?

A. No.

Q. So the way this works is I will ask you questions, and you answer them to the extent that you can. If anything I ask is unclear, you're certainly welcome to ask me to clarify my question.

So if I ask you something you don't understand, just tell me. I will try to rephrase it so that you do understand what I'm asking.

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1           If I ask you something -- it happens a  
2 lot -- that isn't really -- it's not completely  
3 obvious what I'm asking, you know, just tell me that  
4 you don't understand, and I will rephrase it because  
5 we want to make sure that your testimony is clear and  
6 that our questions get answered.

7           Second, you may hear some objections when I  
8 ask a question. The way this works, it's a little  
9 different than it's usually portrayed on TV. If you  
10 hear an objection, you still have to answer a  
11 question, unless you are instructed not to answer by  
12 your counsel or another lawyer. So I might ask a  
13 question, people don't like the wording I used, so  
14 they'll object.

15           If you understand the question, I'm going to  
16 let you go ahead and answer. And I may re-ask it, if  
17 they make an objection I agree with.

18           Does that make sense?

19           A. Yes.

20           Q. I understand you're represented by a lawyer  
21 here today. Is that true?

22           A. True.

23           Q. And that is Mr. Crawford?

24           A. Correct.

25           Q. Now, is Mr. Crawford representing you

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 personally or is he counsel for your employer?

2 A. Representing me personally.

3 Q. Okay. Great.

4 So, Mr. Olomo, you understand that you're  
5 under oath the same -- you understand that; correct?

6 A. Yes, I do.

7 Q. And do you understand the oath you took  
8 today is the same oath you would take if you were in  
9 a courtroom?

10 A. Yes, I do.

11 Q. Is there any reason why you cannot testify  
12 truthfully at your deposition here today?

13 A. No.

14 Q. Where are you testifying from, Mr. Olomo?

15 A. My house.

16 Q. And where is that? Just generally, what  
17 city? Where are you located?

18 A. [REDACTED].

19 Q. And what time is it there approximately now  
20 that we're starting?

21 A. It's 10:08 a.m.

22 Q. And is anyone present in the room with you  
23 as you're testifying?

24 A. No.

25 Q. What did you do to prepare for your

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9/4/2020

1 testimony today?

2 A. I just went through the subpoena that was  
3 given to me.

4 Q. And I'm going to show you a document, if I  
5 can share my screen. Bear with me here. I'm going  
6 to show you what I am going to represent to you is  
7 the subpoena. I want you just to look at it and tell  
8 me -- I'll scroll through it slowly, and you can tell  
9 me if that is, in fact, the document that you  
10 referred to just now.

11 Do you -- it should be loading right now.

12 Do you see a document that says, Coalition  
13 Plaintiffs' Notice of Intent to Serve Subpoena on  
14 Dominic Olomo?

15 A. Yes, I can see the screen, yeah.

16 Q. And this one has four pages. I'm just going  
17 to scroll through it here. So there's page 1.  
18 There's page 2. There's page 3. And there's page 4.

19 Is that the subpoena -- and I think there  
20 was actually also an attachment, but let me just pull  
21 that up.

22 Is that the subpoena that you saw?

23 A. No.

24 Q. Let me pull up a different document.

25 What did the document that you saw look

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 like? Was -- how was it different?

2 A. I can't -- it's just -- can I read what I  
3 have? Can I read it all the way through?

4 Q. Yes. Well, how many pages does the  
5 document you have --

6 A. Oh, I have five pages.

7 Q. Five pages? Okay. Hmm. All right. Well,  
8 let me -- let's see here. And is it -- does it begin  
9 with Exhibit 1? Is that what it says on the first  
10 page?

11 A. No. The first -- it's not -- it's not --  
12 the first -- the pages are not numbered, so yeah.

13 Q. Okay. Well, let me show you a different  
14 document.

15 A. Okay.

16 Q. All right. I'm putting up something that it  
17 should say at the top, Attachment A.

18 Do you see that?

19 A. Yeah. I have that on one page. I have that  
20 on this page.

21 Q. So that is one of the pages that you have?

22 A. Yes.

23 MR. MCGUIRE: Okay. And let's see. All  
24 right.

25 Okay. So the court reporter -- what I

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 would like to do is I would like to mark as  
2 Exhibit 1 for the deposition the document  
3 that I'm showing on my screen which says,  
4 Attachment A.

5 And I will E-mail that to you, and  
6 everybody -- can be circulated -- it can be  
7 circulated to everybody after the  
8 deposition, if that's okay, or I can E-mail  
9 it now, if anybody wants to see it right  
10 now.

11 Hearing no -- hearing no takers --

12 THE REPORTER: It's good. You can  
13 E-mail it to me afterwards...

14 (Discussion ensued off the record.)

15 (Plaintiffs' Exhibit No. 1 was marked  
16 for identification.)

17 BY MR. MCGUIRE:

18 Q. Okay. Great. All right. Great.

19 So, Mr. Olomo, Attachment A lists some  
20 documents to be produced.

21 Do you see that?

22 A. Yes, I can see it.

23 Q. To your knowledge, have these documents been  
24 produced as of now?

25 A. Yes.

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. Were you involved in the gathering of the  
2 documents for production?

3 A. Yes.

4 Q. Who did you work with in the course of doing  
5 that?

6 A. I worked with -- I had -- I consulted my  
7 lawyer, and I did ask Dominion -- Dominion Voting for  
8 permission, too.

9 Q. Did you -- and those documents, did you  
10 produce them or did Dominion produce them? Do you  
11 know?

12 A. Can you -- the first -- yeah, I saw -- can  
13 you rephrase that question? Do you mean like -- I  
14 was the one that gave the documents out, yes.

15 Q. So let me clarify.

16 So I understand you helped gather -- you  
17 helped assemble the documents to be produced; is that  
18 right?

19 A. Correct.

20 Q. And did anyone else assist you in doing that  
21 or was it just you?

22 A. Just me.

23 Q. Okay. So when you had assembled the  
24 documents, who did you transmit them to to be  
25 produced to us?

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. My lawyer.

2 Q. And that's Mr. Crawford?

3 A. Yes.

4 Q. And then did you have any role in the  
5 production of documents after you transmitted them to  
6 Mr. Crawford?

7 A. I don't understand that.

8 Q. Did you do anything else for purposes of  
9 getting us those documents after you gave them to  
10 Mr. Crawford?

11 A. No.

12 Q. Okay. Great. Thank you. So next I just  
13 have another question.

14 Mr. Olomo, we under -- we understand that  
15 there's some equipment being produced today by Fulton  
16 County.

17 Are you aware of that?

18 A. Yes.

19 Q. What is your understanding of what's  
20 happening with that?

21 A. I wasn't involved in that, so I didn't -- I  
22 just know like I -- I heard about it, like that it  
23 was gonna all happen, but I didn't know why or...

24 Q. And what did you hear was going to be  
25 produced in the way of equipment?

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. I didn't hear nothing. I didn't hear  
2 nothing, but I was in the room when they were  
3 gathering the equipment, but I didn't -- no one told  
4 me anything. Yeah.

5 Q. So you just witnessed it happening?

6 A. Yes.

7 Q. Who did you witness involved in that  
8 process?

9 A. My foreman from Dominion came to gather this  
10 equipment.

11 THE REPORTER: I'm sorry. I didn't  
12 hear.

13 BY MR. MCGUIRE:

14 Q. Your boss from Dominion. Who -- and who is  
15 that?

16 A. Mitch.

17 Q. Mitch? Okay.

18 Does Mitch have a last name?

19 A. I'm -- I don't recall his last name.

20 Q. You don't know your boss' last name?

21 A. I know his last name, but it's not just  
22 coming to me. I don't want to say the wrong thing.

23 Q. Was anyone else there besides your boss,  
24 Mitch?

25 A. Yeah. Another one of my colleagues,

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Stephanie, was there.

2 Q. Stephanie? Okay.

3 And does -- do you know Stephanie's last  
4 name?

5 A. I don't.

6 Q. Okay. All right. So you're under oath.  
7 You're aware you're under oath; right?

8 A. Yes.

9 Q. You have to tell the truth.

10 A. Yes.

11 Q. And your testimony is that you don't know  
12 your boss' or coworker's last names?

13 A. Like I said, I know I -- I can go to my  
14 phone and give you Mitch's last name. I know it, but  
15 I just don't want to say a last name that's wrong,  
16 you know, so that's...

17 Stephanie, I don't know her last name. I  
18 only call her Stephanie, her first name, yeah.

19 Q. So have you worked with Stephanie often?

20 A. No.

21 Q. How many times would you say you have seen  
22 her in the last year?

23 A. Twice.

24 Q. Twice.

25 How about Mitch? How often do you see your

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 boss, Mitch?

2 A. Not often. Only if I go back to the Fulton  
3 County -- to Dominion warehouse.

4 Q. So he works at the warehouse and you work at  
5 a different location?

6 A. Yes. And for the record, like, I'm just a  
7 contractor with Dominion, so yeah.

8 Q. Okay. Okay. All right. I'm going to get  
9 into all this stuff, so let's just -- I'll move on,  
10 but let -- I'm going to circle back to that.

11 I want to ask you some basic stuff just sort  
12 of about your background just so we have an  
13 understanding of your history.

14 So what's your citizenship?

15 A. My what?

16 Q. What is your current citizenship?

17 A. Nigeria.

18 Q. And have you applied to become an American  
19 citizen?

20 A. Yeah. In the process of it, yeah.

21 Q. Okay. You're in the process, okay.

22 Have you held any other citizenships besides  
23 Nigeria?

24 A. No.

25 Q. Have you ever been arrested?

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. No.

2 Q. Have you ever been charged with a crime?

3 A. No.

4 Q. And I assume you've never been convicted of  
5 anything, obviously?

6 A. No.

7 Q. Did you complete high school or the  
8 equivalent?

9 A. Yes.

10 Q. And did you do that in the United States or  
11 in Nigeria?

12 A. Yeah. I did that in Nigeria and in London.

13 Q. And in London? Okay.

14 A. Yes.

15 Q. For high school?

16 A. Yes.

17 Q. And where are you from in Nigeria?

18 A. Lagos.

19 Q. Lagos? Okay. Great.

20 So you -- your high school degree is from a  
21 school in the United Kingdom?

22 A. No. I did -- you know, we have something  
23 called -- yeah, it's -- yeah, I'll say yes. Yes.

24 Q. Well, explain it to me just so I know.

25 A. Yes.

\*\*\*\*\* C E R T I F I E D \*\*\*\*\*



Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. I mean, is it a Nigerian school with a  
2 location in the United Kingdom or -- I'm not sure I  
3 understand your answer.

4 A. Yes, it's a Nigerian school in the United  
5 Kingdom, yes.

6 Q. Okay. Great.

7 And do you have an education beyond that  
8 high school degree?

9 A. Yes. I have a --

10 Q. Tell me -- excuse me?

11 A. I have a bachelor's degree.

12 Q. Okay. Great.

13 And where did you get your bachelor's degree  
14 from?

15 A. A university in Nigeria.

16 Q. And what was the name of that University?

17 A. Federal University of Technology.

18 Q. Federal University of Technology?

19 A. Yeah.

20 Q. And is that in Lagos as well?

21 A. It's in a different state.

22 Q. Federal University of Technology.

23 And what -- did you have a major or a focus  
24 of your studies at the Federal University of  
25 Technology?

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. Yes. Computer science.

2 Q. And how many years did you study computer  
3 science at the Federal University of Technology in  
4 Nigeria?

5 A. Five years.

6 Q. And the result of that was a bachelor's  
7 degree you said?

8 A. Yes.

9 Q. Have you had any further formal education  
10 after your bachelor's degree?

11 A. Yes.

12 Q. Tell me about that. What else have you had?

13 A. I have a master's in applied geology.

14 Q. Applied geology?

15 A. Yes.

16 Q. And how long did you study applied geology?

17 A. Like, say three years.

18 Q. And when you were doing that, did you remain  
19 current in your computer science studies or was  
20 that --

21 A. Yes.

22 Q. Yes? Okay.

23 How did you do that?

24 A. What?

25 Q. How did you remain current in computer

\*\*\*\*\* C E R T I F I E D \*\*\*\*\*

Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 science while you were studying geology?

2 A. Geology is kind of like a family thing. My  
3 brothers are applied geophysics, so I did that  
4 because they were starting a company together, so I  
5 just wanted to have a degree in that.

6 Q. Were you working at all --

7 THE REPORTER: I'm sorry. I'm sorry.  
8 Wait. Hold on, Mr. McGuire.

9 Dominic, do you mind speaking up? Your  
10 volume is low and you're getting a little  
11 fast. With your accent, I'm losing what  
12 you're saying.

13 THE WITNESS: Oh, okay. Sorry.

14 THE REPORTER: Can you repeat your last  
15 answer, geology is a family thing, my  
16 brothers are applied geophysics?

17 THE WITNESS: Yeah.

18 BY MR. MCGUIRE:

19 Q. And I'm just trying to understand your  
20 background, and I -- I'm sorry if it seems invasive.  
21 I'm just trying to get a feel for, you know, your  
22 experience.

23 So you took -- you got a master's degree in  
24 applied geology. And during that time, were you  
25 working with computer science or --

\*\*\*\*\* C E R T I F I E D \*\*\*\*\*

Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. Yes.

2 Q. Yes? Okay.

3 That was as a student or was it as  
4 employment?

5 A. Employment.

6 Q. So you were employed while you were getting  
7 your master's?

8 A. Yes.

9 Q. Okay. All right. And beyond your master's  
10 degree, do you have any additional education beyond  
11 that?

12 A. No.

13 Q. So I'd like to ask you about your work now.

14 Beginning with the work you did while you  
15 were getting your master's degree, tell me who you've  
16 worked -- what companies you've worked for.

17 Let's just start with that, between the time  
18 you were getting your master's degree and today,  
19 companies that you have been employed by.

20 A. In the United States or all over?

21 Q. Well, that's a good -- that's a good answer.

22 So let me ask you this: When did you  
23 receive your master's degree? What year?

24 A. That was in 2013.

25 Q. 2013.

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 And then when did you come to the United  
2 States after that?

3 A. 2014, yeah.

4 Q. 2014, okay.

5 So when you came to the United States in  
6 2014, did you come for a job?

7 A. A job? No.

8 Q. So you came to the United States and then  
9 you found employment after you arrived?

10 A. Yes.

11 Q. And that was in 2014?

12 A. Early 2015, yeah.

13 Q. So early 2015 was when you arrived or when  
14 you found employment?

15 A. That was when I found employment, yeah.

16 Q. Okay. Great.

17 So let's start from there, from your early  
18 2015 first employment in the United States. Just  
19 tell me who you've worked for since early 2015.

20 A. So I worked with this company called Abidek  
21 International. They are a shipping company. So --

22 Q. Can you -- let me stop you. Can you spell  
23 that, Abidek?

24 A. A-B-I-D-E-K.

25 Q. Abidek International?

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. Yeah.

2 Q. And what kind of company is that?

3 A. It's a shipping company, shipping -- export  
4 company.

5 Q. And where did you -- where were you when you  
6 worked for Abidek International?

7 A. Georgia.

8 Q. In Atlanta or -- Atlanta area?

9 A. Yeah, yeah. Atlanta area, yeah.

10 Q. Have you been in the Atlanta area since you  
11 arrived in the United States in 2014?

12 A. No. I was in Florida for a few months.

13 Q. For a few months?

14 A. Yes.

15 Q. And then you moved to Georgia?

16 A. Yes.

17 Q. And then you were hired by Abidek  
18 International after you moved to Georgia?

19 I'm sorry. Were you hired by Abidek --

20 A. Yes.

21 Q. Okay. And how long did you work for Abidek  
22 International?

23 A. About six months.

24 Q. And what did you do for them?

25 A. I just -- I set up their server and -- yeah.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. Set up their server?

2 A. Yes.

3 Q. So it was -- it was IT work?

4 A. Yes.

5 Q. What did you do after Abidek International  
6 for work?

7 A. I worked with this company called HCI.

8 Q. HCI?

9 A. Yeah.

10 Q. Were they also in Atlanta?

11 A. Based in Florida.

12 Q. And -- but were you in Atlanta?

13 A. Yeah, I was in Atlanta, but I -- what we do,  
14 I -- what I did for HCI, I traveled around hospitals  
15 to manage this application called Epic.

16 Q. And when you say, "to manage the application  
17 called Epic," is that a -- was that sort of a  
18 software or system administrator job?

19 A. Yeah. I'll say more like a software.

20 Q. Software, okay.

21 A. Yeah.

22 Q. So what kinds of things would you do to  
23 manage the software?

24 A. Yeah. I just -- basically, what I did was  
25 train the physicians and the nurses on how to use the

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 application and managing the software and make sure I  
2 report any incidents that happened on-site to my  
3 immediate supervisor.

4 Q. Okay.

5 A. Yeah.

6 Q. How long were you with HCI?

7 A. About two years.

8 Q. Two years, okay.

9 And what did you do after HCI?

10 A. While -- HCI was more like a contract job,  
11 so while I was working at HCI, I was also working  
12 with this company called North Perimeter  
13 Construction.

14 Q. Not Perimeter?

15 A. Yes.

16 Q. Is that N-O-T?

17 A. Yes.

18 Q. N-O-T. Not Perimeter.

19 A. No. It's N-O-R-T-H.

20 Q. Oh, North -- North Perimeter, okay. North  
21 Perimeter Construction?

22 A. Yeah.

23 Q. And what did you do for North Perimeter  
24 Construction?

25 A. Yeah. I was the IT administrator on-site

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 for the Atlanta office.

2 Q. And you were doing that while you were at  
3 HCI?

4 A. Yeah.

5 Q. And did you do it for -- how long did you  
6 work for North Perimeter Construction?

7 A. About a year.

8 Q. And when did that stop just so I know where  
9 we're at?

10 A. November 2019.

11 Q. So November 2019 is when you ended your work  
12 for North Perimeter Construction?

13 A. Yeah, yeah.

14 Q. What did you do from November '19 or after  
15 November '19? Where did you work?

16 A. Yeah. And I started with Dominion December  
17 2019.

18 Q. And you mentioned that you were -- you were  
19 a contractor -- you are a contractor for Dominion; is  
20 that right?

21 A. Yes. Correct.

22 Q. Okay. So when you were hired by Dominion in  
23 December 2019, your understanding is that you were  
24 hired as a contractor, not an employee?

25 A. Correct.

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Raffensperger

Deposition of  
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9/4/2020

1 Q. Did you continue to work for any other  
2 companies while you worked for Dominion?

3 A. No.

4 Q. And now the three companies you mentioned  
5 prior to Dominion, Abidek International, HCI and  
6 North Perimeter Construction, did you voluntarily  
7 leave those positions?

8 A. Yes.

9 Q. So you were not -- there was no discipline  
10 or termination for any of those?

11 A. No.

12 Q. So what is -- when you were hired -- okay.

13 Let me ask you this: When you were hired by  
14 Dominion in December of 2019, what was your job  
15 title?

16 A. County tech.

17 Q. County tech?

18 A. Yeah.

19 Q. Is that county technician?

20 A. Yes.

21 Q. And has your job title changed between  
22 December 2019 and today?

23 A. No.

24 Q. Have your responsibilities changed during  
25 that time?

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Raffensperger

Deposition of  
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9/4/2020

1 A. No.

2 Q. So you're doing the same job today that you  
3 were hired to do in December 2019 for Dominion?

4 A. Yes.

5 Q. So tell me -- tell me about your job for  
6 Dominion as a county technician. What do you do in  
7 that job? What are your responsibilities?

8 A. Basically, it's simple. Just to manage the  
9 EMS server and...

10 Q. To mind the EMS software?

11 A. Manage. Manage the EMS --

12 Q. I apologize.

13 To manage the EMS software, okay.

14 And what does that -- so first off, what --  
15 when you say "to manage the EMS software," what do  
16 you mean when you say the word "EMS software"?

17 A. I said server, not software.

18 Q. Oh, I'm sorry. You said cyber?

19 A. Server. The server.

20 Q. Can you spell -- oh, server. I'm sorry.  
21 I'm very sorry.

22 Okay. Manage the EMS server. Okay.

23 All right. So when you say the EMS server,  
24 what does that mean?

25 A. It's -- the EMS server means we have

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9/4/2020

1 different -- they have literally like two  
2 applications on that. And that's the EED and the  
3 RTR. So I was trained by Dominion in December 2019  
4 how to use these two applications.

5 Q. And the first one you said was the what?

6 A. The EED.

7 Q. EED. And what does that stand for?

8 A. It's not coming to me right now.

9 Q. What does that -- is that a module? That's  
10 a separate program from the RTR?

11 A. Yeah.

12 Q. Okay. So sometimes my understanding is that  
13 a server can either be a piece of hardware or it can  
14 be a software application.

15 When you say the EMS server, do you mean the  
16 piece of hardware runs these two applications?

17 A. Yes. Correct.

18 Q. Okay. So when you say "server," you're not  
19 talking about a piece of software that's a server;  
20 you're talking about a piece of software that has  
21 these two programs running on it?

22 A. Correct.

23 Q. And the first program is the EED; right?

24 A. Yes.

25 Q. The second program is the RTR?

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Raffensperger

Deposition of  
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9/4/2020

1 A. Correct.

2 Q. Okay. So what does the EED program do?

3 A. Basically, it's used to program the machines  
4 that were used during the election, which is like the  
5 BMD. And the BMD is the ballot marking device. And  
6 the ICP. The ICP, that's the ImageCast® Precinct.  
7 That's the scanner.

8 Q. So the --

9 THE REPORTER: Counsel, there's a few  
10 words in there I didn't understand just  
11 to -- so...

12 BY MR. MCGUIRE:

13 Q. Okay. Let me recap.

14 So the EED -- you used the EED program to  
15 program the ballot marking devices and to program the  
16 ImageCast® printers -- the ImageCast® Precinct  
17 printers or scanners; is that right?

18 A. Yeah. Correct.

19 Q. Okay. And then do you know what RTR stands  
20 for?

21 A. Results tally -- yeah. Result tally, I  
22 think, record. I'm not sure. I don't -- yeah.

23 Q. Okay. What does the RTR program do?

24 A. That's used for -- to collect the results  
25 on the --

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1 Q. So it would collect the results for all of  
2 Fulton County?

3 A. Yes. Correct.

4 Q. And so when you say that you managed the  
5 server and we've -- we've resolved that the server is  
6 the piece of hardware that runs these two programs,  
7 do you do anything else in Fulton County apart from  
8 managing those two programs on that piece of  
9 hardware?

10 A. Yeah. Correct. So I also, like,  
11 troubleshoot those equipment.

12 Q. So you troubleshoot all the election  
13 equipment or just that piece of equipment?

14 A. All election equipment -- most of the  
15 election equipment going from the BMD and the ICP --  
16 which is basically what Dominion Voting provided.

17 Q. So all the equipment in Fulton County, if  
18 there's a problem with any of it, you are the person  
19 that helps troubleshoot it?

20 A. Correct. If it's a Dominion Voting machine,  
21 yes.

22 Q. So if it's a Dominion scanner or a Dominion  
23 BMD, you are the person that Fulton County would ask  
24 to help?

25 A. Correct.

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9/4/2020

1 Q. Okay. Does anyone else have  
2 responsibilities that overlap with yours or are you  
3 the only person who does that for Dominion in Fulton  
4 County?

5 A. For Dominion, yeah, me.

6 Q. You're the only person?

7 A. Yes.

8 Q. And had you ever worked with election  
9 software before you were hired in December 2019?

10 A. No.

11 Q. So everything you know -- is it fair to say  
12 everything you know you know -- you learned from  
13 Dominion?

14 A. Yes.

15 Q. Okay. So what sort of training has Dominion  
16 given you in its server software?

17 A. I don't understand the question.

18 Q. Well, let me make it broader.

19 What training -- it sounds to me like you  
20 have to work on software and you have to work on  
21 hardware; is that true?

22 A. Correct.

23 Q. So have you received training in both of  
24 those areas?

25 A. Correct.

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1 Q. Okay. What training have you received about  
2 the EMS server hardware?

3 A. You mean -- okay. So it's just basically --  
4 it's talking about the hardware. It's just a  
5 workstation then, and the server it's the -- the  
6 server itself and just a couple of workstations.

7 Q. Okay.

8 A. Yeah.

9 Q. So the server and a couple of workstations  
10 you've learned how to -- how they -- what, how they  
11 are connected? I mean, what have you -- what have  
12 they trained you to do with those?

13 A. Yeah. So we have five workstations. So,  
14 basically, how to connect those workstations onto the  
15 server.

16 Q. So you've learned about those. And then  
17 have learned -- you've learned about ballot marking  
18 devices as well?

19 A. Yes.

20 Q. And you've learned about precinct scanners?

21 A. Yes.

22 Q. What about Central scanners? Those are  
23 different I understand.

24 Have you learned about those?

25 A. Yes.

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1 Q. So if there's a problem with one of those,  
2 they break or something, you fix them?

3 A. Break? What do you mean break?

4 Q. Well, if a scanner or a BMD malfunctions,  
5 you're the person who's called to fix it; is that  
6 right?

7 A. Correct. Yeah.

8 Q. And what about the -- what training have you  
9 received on the programs that you mentioned, the EED  
10 and the RTR? What training have you received on  
11 those?

12 A. Basically, how to work the EED. I was to  
13 program cards and also program the CF cards -- how to  
14 program cards, the CF cards and the poll worker --

15 Q. I'm sorry. Let me slow you down.

16 So how to program the CF cards?

17 A. Yes.

18 Q. Is that CompactFlash cards?

19 A. Yes. Correct.

20 Q. And what are those used in?

21 A. Those are used in the ICP.

22 Q. In the ICP, okay. In the precinct scanner?

23 A. Yes.

24 Q. And what was the second thing that you  
25 mentioned?

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1 A. Poll worker cards.

2 Q. Poll worker cards, okay.

3 What are the poll worker cards used in?

4 A. Those are used to work on the BMD.

5 That's -- it's a -- you use it to program the BMD.

6 And, you know, you use on election days to the poll  
7 managers.

8 Q. Poll managers, okay.

9 Have you been given any training in  
10 operating systems by Dominion?

11 A. No.

12 Q. So correct me if I'm wrong. My  
13 understanding is that the Dominion software runs on a  
14 Windows operating system; is that right?

15 A. Correct.

16 Q. Does Dominion provide the hardware that the  
17 Dominion server software runs on or does Fulton  
18 County provide that hardware?

19 A. Dominion provides the hardware.

20 Q. So Dominion gives Fulton County a computer  
21 with the Dominion software on it. Is that how it  
22 works?

23 A. I don't know. Can you rephrase the  
24 question, please?

25 Q. Yeah. I'm just trying to understand.

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1           So if -- there's a piece of hardware that  
2 you call the EMS server.

3           A. Mm-hmm.

4           Q. And I'm wondering, is that piece of hardware  
5 provided to the County by Dominion or does Dominion  
6 just put software on that piece of hardware after  
7 Fulton County has already bought it?

8           A. Okay. Yeah, okay. So to answer that  
9 question, when I go inside the Fulton County  
10 warehouse, the hardware was already installed, so I  
11 don't --

12          Q. The hardware?

13          A. Yeah.

14          Q. So the server software was already installed  
15 on a piece of hardware when you were hired?

16          A. Yes. The hardware and -- the software was  
17 there and the hardware was there. The machine itself  
18 was there, so... I don't know how it got there. I  
19 don't know.

20          Q. You don't know, okay.

21                So -- but you do know that it's a Windows  
22 machines; is that right?

23          A. Correct.

24          Q. Okay. Are you responsible for updating that  
25 machine with operating system patches and things like

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9/4/2020

1 that?

2 A. No.

3 Q. Does anybody do that?

4 A. Not to my knowledge, no.

5 Q. So does the system update itself?

6 A. What do you mean "update itself"?

7 Q. Well, okay. My understanding is that  
8 operating systems get updated all the time normally;  
9 is that right?

10 A. Right. Correct.

11 Q. Does that happen with the Dominion hardware  
12 that runs Windows?

13 A. Not to my knowledge, no.

14 Q. So does that mean that once -- once the  
15 Dominion server is set up on that piece of hardware,  
16 does it, to your knowledge, ever get updated with  
17 fixed or patched software?

18 A. Not to my knowledge, no.

19 Q. Have you trained anybody else at Dominion on  
20 the work that you do?

21 A. Anyone else at Dominion?

22 Q. Yeah.

23 Have you ever given training to anybody on  
24 your own job responsibilities?

25 A. No.

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1 Q. Have you ever trained anyone at Fulton  
2 County?

3 A. Yes.

4 Q. What kinds of things have you trained people  
5 at Fulton County to do?

6 A. I'll say everything I've learned from  
7 Dominion.

8 Q. So you've trained Fulton County personnel  
9 about how to manage the server?

10 A. Correct.

11 Q. And how to fix hardware problems?

12 A. Correct.

13 Q. Who is responsible for doing those things if  
14 there's a problem in the first instance?

15 A. Me.

16 Q. Okay.

17 A. Yeah.

18 Q. So why do you train Fulton County personnel  
19 if you're the first person that comes to help if  
20 there's a problem?

21 A. Because that's part of my job.

22 Q. Do they ever need to do that without you  
23 being there?

24 A. Correct.

25 Q. So can you think of an example of when

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1 there's been a problem that Fulton County has  
2 addressed before they've called you?

3 A. Nothing is -- yeah, yeah. You can -- I -- I  
4 would say -- I can't recall, like, an example now,  
5 but, yeah. Because sometimes I come in late or I  
6 have to go out in the field, you know.

7 Q. So there have been times when Fulton County  
8 has solved problems without you?

9 A. Correct.

10 Q. And -- but is it normal for them to call you  
11 first or for them to solve it themselves first?

12 A. They just seek my advice, you know, if need  
13 be. Yeah.

14 Q. I'm sorry. I didn't understand your answer.

15 A. To seek my advice. Like, they tell me what  
16 the problem is, and if it's something that they can't  
17 do, then they seek my advice but, you know --

18 Q. Okay. So they call you first. And if you  
19 tell them how to fix it and if they can't --

20 A. No.

21 Q. Okay. How does it work then?

22 A. I said, they -- okay. So I work -- if they  
23 have a problem and they're unable to fix it, then  
24 they call me.

25 Q. Okay.

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1 A. Yeah.

2 Q. So they try to fix it first and then they  
3 call you?

4 A. Correct.

5 Q. You said that -- I think you mentioned  
6 earlier -- so your title is "County Technician"?

7 A. Correct.

8 Q. Do you ever work outside of Fulton County or  
9 is that the only place you work?

10 A. That's the only place I work.

11 Q. And I assume -- is there -- is there a  
12 person like you in every county in Georgia?

13 A. Yeah. To my knowledge, yes.

14 Q. And you don't work at Dominion. You work at  
15 the county; is that right?

16 A. Correct.

17 Q. So physically where do you spend your days?

18 A. At the Fulton County warehouse.

19 Q. And is that the location -- is that -- where  
20 is that located?

21 A. I can't recall the number, but it's on  
22 English Street.

23 THE REPORTER: What was the street name?

24 THE WITNESS: English Street.

25 THE REPORTER: Thank you.

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9/4/2020

1 BY MR. MCGUIRE:

2 Q. So you work at the Fulton County warehouse  
3 at English Street.

4 Is that an all-the-time location or only  
5 during elections?

6 A. I'll say most of the time, yeah. Ninety  
7 percent of the time.

8 Q. Because there's always an election getting  
9 ready; right?

10 A. Correct.

11 Q. Do you ever work at polling places?

12 A. No -- yeah, I do -- I do go to polling  
13 places if they --

14 Q. If there's a need?

15 A. Yeah.

16 Q. And what about -- the Fulton County  
17 warehouse, what is -- so you have an office there;  
18 right?

19 A. No.

20 Q. So do you have a workstation there?

21 A. Yes. You can say that, yeah.

22 Q. Is it just out in the open?

23 A. Correct.

24 Q. Do you have your own personal computer or do  
25 you work on Fulton County's systems?

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1 A. I -- yeah, I work on Fulton County EMS  
2 systems not -- I have my own personal laptop.

3 Q. You do have your own personal laptop or you  
4 do not?

5 A. I do have my own personal laptop, yeah.

6 Q. You do, okay.

7 And is that -- when you say "personal," do  
8 you mean individually personal or is it something  
9 that is yours that Dominion gave you?

10 A. My personal laptop.

11 Q. Okay.

12 A. Not that Dominion gave me.

13 Q. And is that the laptop that you use in your  
14 work for Fulton County?

15 A. I don't use it for Fulton County. I use it  
16 for my personal use.

17 Q. So when you don't have work to do for  
18 Dominion, you're able to use your own laptop?

19 A. Well, I don't use it for work. It's just to  
20 check my personal E-mails.

21 Q. Okay.

22 A. Yeah.

23 Q. If you're not doing work stuff, you have  
24 your own stuff there, you can work on that?

25 A. Yes. Correct.

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1 Q. If you have to do work E-mails and anything  
2 like that, what machine do you use?

3 A. I don't -- what E-mails? I use my personal  
4 laptop to send work E-mails because I use my personal  
5 E-mail to send work E-mails, yeah.

6 Q. So if someone from Fulton County wants to  
7 contact you, how do they do it?

8 A. On the phone. They call me.

9 Q. Do they E-mail you ever?

10 A. Ever? No. No, they don't E-mail me. They  
11 call me.

12 Q. So for Fulton County, you only work with  
13 them on the phone?

14 A. Correct.

15 Q. Or in person?

16 A. Correct.

17 Q. But never by E-mail?

18 A. They don't E-mail, yeah. No, no one E-mails  
19 me.

20 Q. So when you work with your -- when you have  
21 interactions with Dominion --

22 A. Mm-hmm.

23 Q. -- is that when you use your personal  
24 computer?

25 A. When I -- I don't -- I don't really -- I --

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9/4/2020

1 most of the time I talk on the phone with Dominion.  
2 I drive to the warehouse.

3 Q. And do you go to the warehouse every day or  
4 only if you're needed there?

5 A. Only if they need for me to go to the  
6 warehouse. I don't go every day.

7 Q. And you would know if you're needed because  
8 someone would call you and say we need something done  
9 or you would have something to do to prepare; is that  
10 right?

11 A. Actually, it's the other way around. If  
12 Fulton County needs me to do something and I can do  
13 it, I need to drive (audio distortion).

14 THE REPORTER: You cut out, Mr. Olomo.

15 BY MR. MCGUIRE:

16 Q. Yeah. Could you answer that question one  
17 more time?

18 A. So it's usually the other way around. If  
19 Fulton County needs something from me, I drive down  
20 to Dominion or get Dominion on the phone, so...

21 Q. Okay.

22 A. Yeah.

23 Q. And is there a separate location where -- so  
24 there are polling places. There's the Fulton County  
25 warehouse. And is there also a location where there

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1 is a central scanning -- a Central scanner? Or is  
2 that done at Fulton -- at the English Street  
3 location?

4 A. You mean scanning -- what do you mean  
5 scanning? What do you mean?

6 Q. So voting happens in polling places; right?

7 A. Correct.

8 Q. In-person voting happens in polling places?

9 A. Yeah. Correct.

10 Q. When people mail in their ballots, where are  
11 those ballots scanned?

12 A. To the best of my knowledge, the last one  
13 was done at the State Farm Arena.

14 Q. The State Farm Arena?

15 A. Yes. Correct.

16 Q. Does it change from election to election  
17 where that happens?

18 A. That's not to my saying. That's Fulton  
19 County.

20 Q. Does Fulton County always do it at the same  
21 location?

22 A. Again, that's for Fulton County. I don't --  
23 they just tell me where to go.

24 Q. But from what you've experienced, is it  
25 always in the same place or is it in different

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1 places?

2 A. I don't -- the last one was at State Farm.  
3 Before that was at -- yeah, it was in State Farm,  
4 yeah. The last one, too, was State Farm.

5 Q. And then -- so voters vote in polling  
6 places. Scanning happens -- last time at State Farm  
7 Arena?

8 A. Correct.

9 Q. What happens at the Fulton County warehouse  
10 on English Street during an election?

11 A. Okay. So the question -- I don't understand  
12 your question.

13 Do you mean election generally or -- because  
14 elections are always going on.

15 Q. Yeah. You know what? I'm going to circle  
16 back to this because I'm going to ask you about what  
17 happens during an election, but we'll get to that. I  
18 want to cover something else. I'm going to change to  
19 a different topic here.

20 So when you are working for Fulton County  
21 and you need -- who do you consider to be your boss?  
22 Is it someone from Dominion or someone from Fulton  
23 County?

24 A. It depends on the situation.

25 Q. What kinds of different situations do you

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1 have in mind?

2 A. You have to feel -- I don't -- it depends,  
3 like I said, on the situation. You can give me a  
4 situation and then I'll say this is a Fulton  
5 County --

6 Q. Well --

7 A. Yeah.

8 Q. -- who do you report to?

9 A. I report to Fulton County warehouse manager.

10 Q. And who's that?

11 A. Derrick Gilstrap.

12 Q. Do you report to anyone else?

13 A. Yes. I report to Dominion project manager  
14 Scott Tucker.

15 Q. Scott Tucker is the Dominion project  
16 manager?

17 A. Correct.

18 Q. And do you report to anyone else besides  
19 Derrick Gilstrap and Scott Tucker?

20 A. Yeah. I have my regional -- regional  
21 manager for Dominion by the name of Brad. I don't  
22 recall Brad's -- I don't know Brad's last name.

23 Q. So Derrick Gilstrap, Scott Tucker and Brad.  
24 Is there anyone else you report to?

25 A. No.

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9/4/2020

1 Q. So earlier you mentioned that you had a boss  
2 named Mitch.

3 Who is he -- who is he in your chain of  
4 command?

5 A. So Mitch, he was my trainer for the one-week  
6 training I had with Dominion.

7 Q. That was in December of 2019 when you were  
8 first hired?

9 A. Correct.

10 Q. So you -- so is he a boss or is he a trainer  
11 or both? What is his role?

12 A. I'll say a trainer, yeah.

13 Q. Does he have a title, a job title?

14 A. I don't know.

15 Q. And --

16 A. I don't recall his job title.

17 Q. And you don't see him very often?

18 A. Not very often.

19 Q. He trained you initially though; right?

20 A. Correct.

21 Q. When was the last time you saw him?

22 A. Yesterday.

23 Q. Yesterday, okay.

24 What happened yesterday with Mitch?

25 A. He came to the Fulton County warehouse

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 and --

2 Q. Okay.

3 A. Yeah. And he asked me to -- yeah.

4 Q. What did he ask you to do?

5 A. Yeah. Just to get ready -- like, you know,  
6 just log into the server, so he can get some  
7 equipment ready.

8 Q. And so he asked you to log in, so he could  
9 get some equipment ready.

10 And then did he do anything else with you?

11 A. No.

12 Q. So you logged him in.

13 And then did you observe what he did?

14 A. Yeah. I was standing right by him, yeah.

15 Q. So what did he do while he was logged in?

16 A. All he did was just normal programming, poll  
17 worker card, the tech card and the USB.

18 Q. So he programmed a US -- I'm sorry. I'm  
19 going to ask you to go through those.

20 So he programmed what now?

21 A. Basically, what he did was just program the  
22 poll worker card, the tech card, the USB. We did  
23 everything we use during -- you know, to program the  
24 voting equipment.

25 Q. The voting equipment?

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. Yes.

2 Q. So what was the first one that you  
3 mentioned? I didn't quite understand your -- what  
4 you said.

5 A. Poll worker card.

6 Q. The poll worker card. So he programmed the  
7 poll worker card.

8 And then what was the second thing he  
9 programmed?

10 A. The tech card.

11 Q. A tech card.

12 What is a tech card?

13 A. A tech card is the card -- that's like the  
14 administrator card.

15 Q. Is that used by voting workers or is it used  
16 by Dominion people?

17 A. Not Dominion people. It's used by anyone  
18 that's going to work on the voting machine.

19 Q. So what would you use a tech card to do, for  
20 example?

21 A. To program the ICX machine.

22 Q. And what's the ICX machine?

23 A. That's the ImageCast® X. ImageCast® X. So  
24 that's the -- you know, the big tabloid screen.

25 Q. Is that the -- I'm sorry. It's the big

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Raffensperger

Deposition of  
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9/4/2020

1 what?

2 A. The big tabloid, you know, like the voting  
3 machine. That's where voters cast their vote.

4 Q. Is it a BMD screen?

5 A. Yeah. You call it -- yeah, BMD screen you  
6 can call it.

7 Q. So it's the touch screen that voters touch?

8 A. Correct.

9 Q. So a tech card allows you to program a touch  
10 screen?

11 A. Correct.

12 Q. And then so he did a poll worker card, a  
13 tech card, and then you said a USB stick?

14 A. Yeah. Correct.

15 Q. What is that -- what was -- what programming  
16 goes on that?

17 A. It's the same thing just it goes with the  
18 tech card. So it's basically the same thing. Does  
19 the same work as a tech card.

20 Q. Okay.

21 A. They go hand-in-hand.

22 Q. So why do you need both of those?

23 A. Because the USB has database on it, and the  
24 tech card is used to program it.

25 Q. To program the database?

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Curling v.  
Raffensperger

Deposition of  
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9/4/2020

1 A. No. To program the ICX --

2 Q. Oh, I see.

3 (Overlapping speakers.)

4 THE WITNESS: Okay.

5 BY MR. MCGUIRE:

6 Q. Okay. So he programmed a USB with the  
7 database.

8 By program -- I mean, a USB is a storage  
9 device; right?

10 A. Correct.

11 Q. So when you said he programmed the USB, what  
12 do you mean exactly?

13 A. Come again, please? You said program the  
14 USB?

15 All he did was just -- okay. So when you're  
16 programming -- when you -- you put -- not the old  
17 database -- when you say database -- the database --  
18 what we understand is database is like the whole  
19 election -- election project. But no.

20 So what he did was just program -- put a  
21 program on it so that the ICX machine -- we  
22 understand what precinct that ICX machine is being  
23 allocated to.

24 Q. So you saw him program the poll worker card,  
25 the tech card and the USB with the database.

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Raffensperger

Deposition of  
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9/4/2020

1 Did he do anything else while you were  
2 watching?

3 A. Going back to -- I'd like to correct that.

4 The database is -- that's like the old  
5 database. That's the project. So the -- what I just  
6 program on the USB is just the precinct. Like, it's  
7 just -- it's the -- for the ICX machine that you call  
8 the BMD screen, to recognize what precinct that BMD  
9 has been allocated to.

10 Q. Okay.

11 A. Yeah.

12 Q. Did he -- did he ask -- did he say why he  
13 was doing this programming?

14 A. No. Yeah. I didn't ask.

15 Q. What else did he do after he did those --  
16 programmed those three things?

17 A. He laid them on the table and he had a  
18 conversation with my boss at the Fulton County  
19 warehouse.

20 Q. Mr. Gilstrap?

21 A. Correct.

22 Q. All right. Okay. And did you hear that  
23 conversation?

24 A. No. I wasn't in the conversation.

25 Q. Was it within earshot of you?

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9/4/2020

1 A. Yes. I was working then, but I didn't get  
2 it.

3 Q. You didn't hear what they said?

4 A. No.

5 Q. You didn't hear any of it?

6 A. No.

7 Q. After that conversation, did Mr. -- did  
8 Mitch do anything else or did he leave?

9 A. He left.

10 Q. And then what happened to the equipment that  
11 he had programmed? It was left on the table or what  
12 happened to it?

13 A. Correct. It was left on the table.

14 Q. Now -- okay. So if there's a  
15 conflict between -- or, well, let me back up.

16 Has there ever been a situation when what  
17 your boss at Dominion says to do is different than  
18 what your boss at Fulton County, Mr. Gilstrap, wants  
19 to do?

20 A. What do you mean "conflict"?

21 Q. Has there ever been a situation where your  
22 Fulton County bosses want to do something different  
23 than your Dominion bosses?

24 A. I don't recall, no.

25 Q. If that were to come up, whose instructions

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9/4/2020

1 would you have to follow?

2 A. Dominion. Dominion hired me.

3 Q. Based on what you've seen -- you've been  
4 there for almost a year now; correct?

5 A. Correct.

6 Q. So based on what you've seen, would it be  
7 possible for Fulton County to run an election without  
8 Dominion's assistance?

9 A. That would be a question to ask a Fulton  
10 County warehouse manager.

11 Q. Sure.

12 No. I'm -- and I'm just asking for your  
13 opinion. I mean, based on what you've seen, what is  
14 your opinion about that?

15 A. I don't have one.

16 Q. I'm going to ask you a little bit about the  
17 Dominion system.

18 Are you familiar with the label Democracy  
19 Suite 5.5A?

20 A. I don't get that.

21 Q. So earlier you talked about the EED and the  
22 RTR.

23 Do you remember that?

24 A. Correct.

25 Q. Those are computer programs; right?

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Curling v.  
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9/4/2020

1 A. Correct.

2 Q. And they are Dominion computer programs;  
3 right?

4 A. Correct.

5 Q. Those programs come in certain versions;  
6 correct?

7 A. I have no idea. I have no knowledge of  
8 that.

9 Q. So as a general matter, though, you're aware  
10 that software usually has different versions; right?

11 A. Correct.

12 Q. As far as Dominion's software, does it have  
13 versions or not?

14 A. I don't have any knowledge of that. I  
15 don't.

16 Q. So no one at Dominion has ever told you that  
17 there are different versions of Dominion software?

18 A. No.

19 Q. Have you ever seen these software programs,  
20 EED or RTR, be changed or upgraded?

21 A. No.

22 Q. Have you ever seen the EED or RTR programs  
23 be patched?

24 A. No.

25 Q. So you've never seen them modified at all

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Curling v.  
Raffensperger

Deposition of  
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9/4/2020

1 since you've been there and since December of 2019?

2 A. At Fulton County warehouse? No.

3 Q. What about the software that runs on the ICP  
4 and the BMDs? Are there -- is there different  
5 software that runs on those?

6 A. Oh, I can't answer that because I don't have  
7 an idea about it, yeah.

8 Q. So you have been trained on how to fix those  
9 machines if they malfunction; right?

10 A. Correct.

11 Q. Does that ever involve looking at them --  
12 looking at their software?

13 A. No.

14 Q. It's always just purely mechanical problems?

15 A. Correct.

16 Q. So you would -- would you be aware if the  
17 software on those machines had ever been changed  
18 since you started at Dominion?

19 A. I don't understand your question.

20 Q. So if the software on any component of the  
21 system had been changed since December of 2019, would  
22 you know about it?

23 A. They look the same to me, so I don't -- I  
24 don't -- I will -- I don't know.

25 Q. So if software had to be changed on any

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9/4/2020

1 component, who at Dominion would install the change?

2 A. That will be -- I don't have an answer for  
3 that because I don't -- all I do I told you.

4 That's -- I don't have an answer for that.

5 Q. So -- and I'm just going to ask you a  
6 hypothetical question. And I understand it's  
7 hypothetical, but I'm asking you for what you -- what  
8 you think the right answer is.

9 If there was an error with a piece of  
10 software, let's say the RTR, that needed to be fixed  
11 and Dominion had a fix for it, who would install that  
12 fix? Would it be you or someone else?

13 A. That will be a question for Dominion because  
14 that never happens, so I wouldn't know.

15 Q. So you've never installed anything on any  
16 piece of equipment?

17 A. No. Nothing.

18 Q. Have you ever seen anyone install anything  
19 on any piece of equipment?

20 A. No.

21 Q. Do you ever work at the Dominion warehouse?

22 A. Yes, I do.

23 Q. Does Fulton County equipment ever go to the  
24 Dominion warehouse?

25 A. Come again? Can you rephrase your question?

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Curling v.  
Raffensperger

Deposition of  
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9/4/2020

1 Like, what do you mean by "equipment"?

2 Q. Sure.

3 So does any Fulton County equipment -- is  
4 any Fulton County election equipment ever transferred  
5 or transported to the Dominion warehouse, to your  
6 knowledge?

7 A. Not to my knowledge, no.

8 Q. So tell me about -- you said that I believe  
9 you work at the Fulton County warehouse at English  
10 Street most of the time; is that right?

11 A. Correct.

12 Q. And you said you don't have a workstation  
13 there like an office; correct?

14 A. Correct.

15 Q. So when you're there, do you just work out  
16 in the open?

17 A. Correct.

18 Q. Is there like a desk or a table that you get  
19 to use?

20 A. It's not personal. I just sit on -- I just  
21 sit there. The space is not personal.

22 Q. Just find a spot and sit there?

23 A. Correct.

24 Q. Now, is the EMS server hardware kept at that  
25 warehouse?

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Curling v.  
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9/4/2020

1 A. Correct. Yeah.

2 Q. How is it stored?

3 A. It has its own server rack, yeah.

4 Q. It has a server rack.

5 And what is a -- is a server rack -- what is  
6 that? Is that like a metal cage that it's kept in?

7 A. Yes.

8 Q. Is it possible to access that rack? How do  
9 people access the server if it's within that rack?

10 A. It has a door, so you need to open the door,  
11 and -- yeah.

12 Q. I think you cut out a little bit on my end,  
13 so could you repeat your answer there?

14 A. Oh, yeah. Okay.

15 There's a door. You know, it's a --  
16 it's more like a rack, but like I said, like it's a  
17 cage. So it has a door. You need to open the door  
18 for you to access the server.

19 Q. Can you access any part of it from the  
20 outside or do you have to open the cage to access it?

21 A. You have to open the cage to access it,  
22 yeah.

23 Q. And is the cage -- is there a lock on it?

24 A. Yeah. There's a latch on it.

25 Q. A latch.

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9/4/2020

1 Does the latch have like a padlock or is  
2 there any way it's locked?

3 A. Yeah. It has a key lock.

4 Q. Is the key a padlock or is it built in?

5 A. It's built in.

6 Q. And who has the key?

7 A. The Fulton County warehouse manager.

8 Q. What about you? Do you have a key?

9 A. I do not have a key.

10 Q. So if you need to get into the rack to  
11 access the server hardware, you have to get the key  
12 from Derrick Gilstrap?

13 A. Yes. No. Okay. So how it works,  
14 there's -- the rack is in the warehouse. The  
15 warehouse door is always locked.

16 Q. Okay.

17 A. Yeah.

18 Q. Well, do you have access to the warehouse  
19 yourself?

20 A. No, I do not.

21 Q. So it has to be opened by somebody before  
22 you can go there?

23 A. Correct.

24 Q. And then I think once you're inside the  
25 warehouse, you said the rack itself is also locked?

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9/4/2020

1 A. It's most of the time closed.

2 Q. Most of the time closed.

3 Is it locked?

4 A. Locked -- what do you mean "locked"? What  
5 do you mean by "locked"? Yes. It is locked, yeah.

6 Q. So can you open it without the key?

7 A. Yes, you can open it without the key.

8 Q. So it's -- is it inside any kind of locked  
9 room inside the warehouse?

10 A. Yes.

11 Q. And that's where it stays?

12 A. Correct.

13 Q. Who has access to that room?

14 A. The Fulton County warehouse manager.

15 Q. And anybody else?

16 A. Not to my knowledge.

17 Q. So if you need to access the rack, you --  
18 what do you do?

19 A. When I come in in the morning, the Fulton  
20 County warehouse manager is always there, so...

21 Q. So how would you access the rack if you come  
22 in and he's there?

23 A. I always walk by his office. So like first  
24 thing I do is I go to his office and say "good  
25 morning" to him, and he tells me what to do for that

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Raffensperger

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9/4/2020

1 day. And, yeah, we go from there.

2 Q. And so if you need to get to the rack, what,  
3 do you ask him for the key to that office?

4 A. He always, like, walks with me to the  
5 server.

6 Q. I'm sorry?

7 A. He walks me to the server every day.

8 Q. He walks you to the server every day?

9 A. Yeah.

10 Q. So do you access it every day?

11 A. Not every day, not if I don't need to, no.  
12 I wouldn't say every --

13 Q. Have you ever seen anyone else besides you  
14 accessing it?

15 A. Yeah. Fulton County employees, yeah.

16 Q. Anyone -- these are people that you know are  
17 Fulton County employees?

18 A. Correct.

19 Q. They are people you recognize?

20 A. Correct.

21 Q. How many Fulton County employees have you  
22 seen accessing the rack?

23 A. Two. The Fulton County warehouse manager,  
24 and a Fulton County employee.

25 Q. And do you know that person's name?

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1 A. Yes. John. John Ross.

2 Q. John Ross, okay.

3 So you've only seen John Ross and Derrick  
4 Gilstrap access the rack?

5 A. Correct.

6 Q. Anyone else?

7 A. No one.

8 Q. How many -- I mean, the room where it's  
9 kept, where the rack is kept, is there anything else  
10 in that room?

11 A. Yes. We have the voting machines, the BMDs  
12 and the ICPs, and we have an ICC scanner right by the  
13 server.

14 Q. That sounds big. How big is the room?

15 A. It's big. It's a warehouse.

16 Q. Oh, so the warehouse is the room?

17 A. The warehouse has offices attached to it, so  
18 when I say "the warehouse," the warehouse offices,  
19 but the room where you have the server --

20 Q. Yes.

21 A. -- you have the BMD, and the ICX and the ICP  
22 machines in the room, in the same room, yeah.

23 Q. So we're not talking about a small room?

24 A. Correct.

25 Q. Does anyone else work inside that room or is

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9/4/2020

1 it just a storage room?

2 A. Yeah. It has other Fulton County employees  
3 working in there.

4 Q. So is that on a daily basis that other  
5 people are working in that room?

6 A. Correct.

7 Q. And what kinds of work do you see them doing  
8 in that room?

9 A. To the best of my knowledge, everyone in  
10 that room works on the Fulton machines.

11 Q. And is it more than just John Ross and  
12 Derrick Gilstrap?

13 A. You mean in the room --

14 Q. Yes.

15 A. -- in the warehouse? Yes.

16 Q. Well, I don't mean in the warehouse. I mean  
17 in the room where the rack is kept.

18 A. Yes. Correct.

19 Q. How many people would you say besides John  
20 Ross and Derrick Gilstrap work in the room where the  
21 rack is kept?

22 A. I'll say about 10 to 15.

23 Q. Ten to 15 people?

24 A. Yeah.

25 Q. And do those people unlock the door to that

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Raffensperger

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9/4/2020

1 room every time they go in and out?

2 A. What do you mean, "unlock the room"? What  
3 do you mean?

4 Q. So you said that 10 to 15 people plus John  
5 Ross plus Derrick Gilstrap work in the room where the  
6 rack is that holds the EMS server. And I'm wondering  
7 if those people who work in that room unlock it and  
8 relock it every time they enter and exit that room.

9 A. I'm not sure. That's a Fulton County  
10 question.

11 Q. Based on what you've seen, have you seen  
12 people go in and out of that room without unlocking  
13 and locking it?

14 A. Yeah. Yeah, I've seen people go in and out,  
15 but I don't think they, like, unlock it or lock it.  
16 I don't think they have access to it.

17 Q. So the people who go in and out, are you  
18 saying they do have access or they do not have access  
19 to that room?

20 A. They have -- they don't have access to  
21 unlock it I mean, to the best of my knowledge.

22 Q. Do they use a key every time they go into  
23 that room?

24 A. No.

25 Q. So the room is unlocked at least some of the

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9/4/2020

1 time?

2 A. Yeah. During working hours, yeah.

3 Q. During working hours.

4 So just to summarize, so the server is kept  
5 in a rack, which is not always locked; correct?

6 A. Not always locked. It's always locked.  
7 It's closed. It's a rack. It's a cage.

8 Q. It's always closed, but you could open it by  
9 pulling on the door to open it?

10 A. Correct.

11 Q. And that rack is stored inside a room that  
12 10 to 15 people work in, and it is not always locked  
13 during business hours; correct?

14 A. The door itself, yeah. If you need to go  
15 out, you can go out and come, yeah, correct.

16 Q. And is there also a loading dock door that  
17 goes into that room?

18 A. No, not inside that room.

19 Q. That's a different room?

20 A. Yeah.

21 Q. Is there any kind of sign-in sheet for  
22 people who go into that room or any kind of log of  
23 who goes in and out of that room where the rack is  
24 stored?

25 A. Yes.

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Curling v.  
Raffensperger

Deposition of  
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9/4/2020

1 Q. Is it a sign-in sheet?

2 A. Yes, it's a sign-in sheet.

3 Q. And where is the sign-in sheet posted?

4 A. Outside the door before you can walk into  
5 where you log in.

6 Q. Is there a person who watches the door to  
7 make sure that people always sign in?

8 A. Yes.

9 Q. And who is that person?

10 A. That will be the assistant Fulton County  
11 warehouse manager.

12 Q. Does that person have a name?

13 A. Yeah. Tim Cummings.

14 THE REPORTER: I'm sorry?

15 BY MR. MCGUIRE:

16 Q. Tim Cummings?

17 A. Right.

18 THE REPORTER: Oh, Tim. Okay.

19 BY MR. MCGUIRE:

20 Q. And so when he's not there watching who goes  
21 in and out, does that room get locked?

22 A. Again, he's always there.

23 Q. He's always there?

24 A. Correct.

25 Q. Let's see.

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1           Okay. I want to ask you about how elections  
2 are conducted in Fulton County. I want to ask you  
3 about the workflow of actually conducting an  
4 election. And I want to break it into pieces.

5           So the areas I want to cover are logic and  
6 accuracy testing and then how votes are cast and  
7 recorded and then how the results are tabulated, just  
8 so you know where I'm going. Okay?

9           So I want to start with logic and accuracy  
10 testing. Do you know what that is?

11          A. I do.

12          Q. What is logic and accuracy testing in your  
13 mind?

14          A. It's not just in my mind. It's what it  
15 stands for.

16          Q. What does it stand for?

17          A. It stands for -- logic and accuracy is to  
18 make sure that the machines going out for election or  
19 advance voting, they are certified and...

20          Q. So how do you -- have you been trained on  
21 how to conduct logic and accuracy testing?

22          A. Correct.

23          Q. Who trained you for that?

24          A. Dominion.

25          Q. Has Fulton County separately trained you?

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Curling v.  
Raffensperger

Deposition of  
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9/4/2020

1 A. I work with Fulton County, yes.

2 Q. When logic and accuracy testing is  
3 conducted, who conducts it, you or Fulton County  
4 people?

5 A. Fulton County people, and I do, too.

6 Q. You do it as well?

7 A. Yes.

8 Q. How do you decide who's going to do it?

9 A. I don't decide. Fulton County decides.

10 Q. So they'll ask you to do it sometimes?

11 A. Correct.

12 Q. Does somebody watch you while you do it?

13 A. Yes. Like I said, we work in groups, so  
14 it's a group. It's a group of four techs. And I  
15 could be in any group.

16 Q. Did you ever train anyone at Fulton County  
17 on logic and accuracy?

18 A. Yes.

19 Q. Who, for example, have you trained?

20 A. I would say no -- yeah. No, no. They told  
21 me -- they asked me how -- basically, I train them  
22 how to use Dominion machines, not, you know, how  
23 to -- because it's different to train them how to use  
24 the machines and how they go about doing the L&A. So  
25 the process is different. So how to use the

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 machines, yes, I train them on how to use the  
2 machines.

3 Q. So using the machines for the logic and  
4 accuracy testing is different than using the machines  
5 for conducting an election?

6 A. No. That's not what I said.

7 Q. Okay.

8 A. I said during L&A I train them how to use  
9 the machines.

10 Q. Okay.

11 A. And then during L&A, during voting, the same  
12 thing. But the process of L&A has to do with Fulton  
13 County, how they want to conduct an L&A, you know.

14 Q. Okay.

15 A. How many precincts they have. That process  
16 is different.

17 Q. And are you aware of what the -- what the  
18 state requirements are for conducting logic and  
19 accuracy testing?

20 A. Yeah. I believe that was how Dominion  
21 trained me.

22 Q. So did Dominion train you to do a test of  
23 every contest on every machine?

24 A. What do you mean, "contest"? You mean every  
25 candidate of every ballot style? Is that what you

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 mean?

2 Q. Yes.

3 A. Yes.

4 Q. So that is how Dominion trained you to  
5 conduct a logic and accuracy test?

6 A. Correct.

7 Q. And then is that what you have observed is  
8 what Fulton County does when it conducts logic and  
9 accuracy tests?

10 A. Correct.

11 Q. So you -- in your experience, you're saying  
12 Fulton County tests every contest and every ballot  
13 style on every machine?

14 A. Correct.

15 Q. So logic and accuracy testing happens when?

16 A. I don't decide when.

17 You mean dates?

18 Q. Well, just in the context of an election,  
19 when does it happen?

20 A. Before the equipment are shipped out to the  
21 voting locations.

22 THE REPORTER: I'm sorry. Repeat that  
23 again. I'm sorry. I'm sorry. You need to  
24 repeat that.

25 Can you please speak up? I'm having a

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 hard time hearing you.

2 Thank you.

3 THE WITNESS: Yeah. So it happens  
4 before the voting equipment are shipped out  
5 to voting locations.

6 THE REPORTER: Thank you.

7 BY MR. MCGUIRE:

8 Q. And when you say shipped out, you mean --  
9 where is the equipment shipped out from?

10 A. From the Fulton County warehouse.

11 Q. And where is it shipped out to?

12 A. Different voting locations. Depends on the  
13 precinct.

14 Q. So does that mean that between elections all  
15 of the equipment is stored at the warehouse?

16 A. Correct.

17 Q. And then it's all tested through logic and  
18 accuracy testing. And then it's shipped out to the  
19 polling places?

20 A. Correct.

21 Q. And when you say equipment, what equipment  
22 gets tested in logic and accuracy testing? What  
23 components?

24 A. The BMD machine, which is comprised of the  
25 ICX and the printer.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. Mm-hmm.

2 A. And the ICP.

3 Q. So the BMD, which is the ICX and the  
4 printer?

5 A. Yeah.

6 Q. And then what was the second one you said,  
7 the ICP?

8 A. Yeah.

9 Q. And that's the precinct scanner?

10 A. Correct.

11 Q. What about the high capacity scanner; is  
12 that tested also?

13 A. Yes.

14 Q. Is that tested as part of the pre-election  
15 logic and accuracy testing?

16 A. Correct.

17 Q. And just to circle back, you said that when  
18 you test the equipment, the BMDs for example, you do  
19 test all contests for all ballot styles on each  
20 machine?

21 A. Correct.

22 Q. And that's what you've seen happen?

23 A. Correct.

24 Q. And have you ever seen that not happen?

25 A. Not to the best of my knowledge. Again, I

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 didn't do L&A. Fulton County employees do L&A.

2 Q. So there's some L&A that you don't see?

3 A. It's a big -- it's a big warehouse and it's  
4 a big precinct. I can't cover all the precincts.  
5 Yeah, so...

6 Q. How do you decide what to observe?

7 A. I just -- I walk around if I'm able to,  
8 yeah.

9 Q. If they have trouble, they ask you for help?

10 A. Correct.

11 Q. Have you ever seen anyone having trouble  
12 during logic and accuracy testing?

13 A. Trouble in what?

14 Q. Have they ever needed your help with  
15 anything during logic and accuracy testing?

16 A. Yes. Maybe if the BMD -- if the ICX machine  
17 is not coming out, the printer is jammed, I go  
18 into...

19 Q. Have you ever had any problems during logic  
20 and accuracy testing that you could not solve?

21 A. No.

22 Q. Have you ever had any problems during logic  
23 and accuracy testing that you could not solve without  
24 asking someone else for help?

25 A. Yeah. Yeah. I've had one. You know, the

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 ICX machine wasn't coming on, so I had to call  
2 Dominion and -- you know, because just -- it's just  
3 one of the machines. I was told to put it aside and,  
4 you know, bring up a new one.

5 Q. So when you -- when that kind of thing  
6 happens, like in that example, who do you call at  
7 Dominion?

8 A. I call Brad. He's my --

9 Q. Brad?

10 A. Yeah.

11 Q. And does he solve it for you or does he call  
12 someone else?

13 A. That, I don't know. He just gets back to me  
14 and say, you can put it aside and, you know, put up  
15 the new BMD -- ICX machine. We come -- you know, we  
16 have some ICX machines that we're stacking up like  
17 that.

18 Q. Does anyone from Dominion ever give you  
19 technical advice or technical assistance?

20 A. Yeah. If I need it, yeah.

21 Q. And is that Brad or is that someone else?

22 A. That would be Mitch.

23 Q. Mitch, okay.

24 How often would you say you've had to get  
25 Mitch involved to help you with something since

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Curling v.  
Raffensperger

Deposition of  
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9/4/2020

1 you've started at Fulton County?

2 A. Not pretty often but, you know, there have  
3 been occasions like that.

4 Q. So once the testing is done, are you  
5 involved in election day voting at all in helping  
6 with election day voting?

7 A. What do you mean election day voting? What  
8 do you --

9 Q. So how do people vote? They vote in person  
10 and they vote by mail, right?

11 A. Correct.

12 Q. And the ones who vote in person vote on  
13 BMDs?

14 A. Correct.

15 Q. Or they vote on provisional or emergency  
16 ballots, right?

17 A. Correct.

18 Q. BMDs are on the ICX?

19 A. Correct.

20 Q. And provisional and emergency ballots are  
21 paper ballots, right?

22 A. Correct.

23 Q. So BMDs print out the voter's choice on a  
24 ballot card?

25 A. Correct.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. And then that ballot card gets scanned by  
2 the ICP?

3 A. Correct.

4 Q. And provisionals and emergency ballots also  
5 get scanned by the ICP?

6 A. Correct.

7 Q. Is there anything else that happens for  
8 in-person voters or is that it?

9 A. Yeah. But, you know, it's an -- (audio  
10 distortion) that if I need to -- if that happens.  
11 You know, in a case where probably like the ICP  
12 scanner is down, they could switch over to the  
13 emergency slot as well.

14 Q. And I'm really sorry. I have to ask you to  
15 repeat that because you kind of cut out.

16 A. Okay. Yeah. So if there's a problem at the  
17 location, the precinct, with the ICP scanner, they  
18 could always switch over to the emergency slot.

19 THE REPORTER: Switch over to the what?

20 MR. MCGUIRE: The emergency --

21 THE REPORTER: The emergency --

22 THE WITNESS: The emergency slot, yeah.

23 THE REPORTER: Thank you.

24 BY MR. MCGUIRE:

25 Q. Emergency -- emergency what?

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. Emergency slot. There's this like -- it's  
2 emergency bin. Sorry. I said slot. Emergency --

3 Q. Emergency slot?

4 A. Yeah.

5 Q. Emergency pin, okay.

6 A. Bin, B-I-N.

7 Q. B-I-N. Oh, I see.

8 And what is the emergency bin exactly?

9 A. Yeah. So it's when you print out ballot  
10 from the BMD and your ICP is down, in any case, if  
11 the ICP is down, you can switch over to the emergency  
12 bin until you can get a new scanner.

13 Q. And does the emergency bin just collect  
14 ballots or does it process them in some way?

15 A. It doesn't. It just collects.

16 Q. Just collects.

17 So then when you get your scanner back up,  
18 you then can scan those ballots?

19 A. Yes. Correct.

20 Q. So that's in-person voting.

21 And then for people who vote by mail, how do  
22 their ballots get processed?

23 A. I haven't had a firsthand experience in  
24 that, so I wouldn't know how to answer that.

25 Q. Do you have an understanding of what

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 happens?

2 A. From what I've read, yes.

3 Q. What is your understanding of what happens  
4 with mailed ballots?

5 A. It gets processed in a different department.

6 Q. And is that department -- is that what  
7 happens when the ballots get scanned by the high  
8 capacity scanners?

9 A. No. When I say in -- not that department,  
10 it's processed in a different department. But I am  
11 involved when the -- when they want to scan those  
12 ballots. I go in to program the ICC, but that's the  
13 Central scanner.

14 Q. And the Central scanner is what they use to  
15 scan all the mail ballots?

16 A. Correct.

17 Q. So then after the scanning, the ICP scanner  
18 at the polling places has a record of the votes;  
19 correct?

20 A. Correct.

21 Q. And where are those -- what records of the  
22 votes does the ICP scanner keep?

23 A. What do you mean "records of the votes"?

24 Q. So does it take a scan, like a picture of  
25 each ballot that it scans? Does it have that saved?

\*\*\*\*\* C E R T I F I E D \*\*\*\*\*

Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. I wouldn't -- I can't answer that.  
2 That's -- I wasn't trained like that. I wasn't --  
3 yeah.

4 Q. Well, okay. So -- all right. Let me back  
5 up.

6 So if the ICP scanner is -- you scan  
7 in-person votes through the ICP scanner. It reads  
8 the ballot; correct?

9 A. Correct.

10 Q. And it interprets what the votes are; right?

11 A. Correct.

12 Q. How does it store that information?

13 A. It stores it on the CompactFlash card.

14 Q. On a CompactFlash card, okay.

15 Now, we've seen ballot images which look  
16 like they're scanned images of the ballots.

17 Is that done on the ICP?

18 A. I can't answer that. That would be a  
19 Dominion thing to answer.

20 Q. So you've never been trained on ballot  
21 images at all?

22 A. No.

23 Q. And I don't want to jump ahead of myself,  
24 but I have in mind the pictures of the ballot that  
25 the adjudication people look at.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. Correct.

2 Q. I want to understand if you know where that  
3 picture comes from that the adjudication people look  
4 at.

5 A. Yeah. So that's for -- that's coming from  
6 the ICC, the Central scanner. And, yeah, I was  
7 trained on how to get those images in the Central  
8 scanner.

9 Q. So what about for the people who vote  
10 provisional or emergency ballots, do they not go  
11 through adjudication?

12 A. I don't know.

13 Q. But those scanned pictures of ballots,  
14 you're saying that doesn't happen at the precinct  
15 scanner?

16 A. Again, I can't answer that.

17 Q. You don't know?

18 A. Yeah.

19 Q. All right. So for the ICC, the Central  
20 scanner, what kind -- how does it store the pictures  
21 of the ballots that it scans?

22 Sorry. Did I cut out there?

23 A. Yeah, a bit, you did.

24 Q. Let me ask again.

25 So for the ICC scanner, the Central scanner,

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 how does it store the pictures of the ballots? Where  
2 does it store those?

3 A. In the C drive.

4 Q. Okay.

5 A. There's a folder in C drive that stores  
6 those images.

7 Q. And does it interpret the votes as it scans  
8 just like the precinct scanner does?

9 A. I wouldn't -- I wouldn't know. No. I don't  
10 know.

11 Q. So I guess I'm asking -- or I guess the  
12 question I would have then is: Each precinct  
13 scanner, after you scan the ballots in the precinct,  
14 has a total of how the votes came out; right?

15 A. Correct.

16 Q. Does the Central scanner have a total of how  
17 the votes came out?

18 A. Yes.

19 Q. So then would you agree that that means it  
20 must be interpreting the votes in counting them?

21 A. Again, you know, I just -- based on what I  
22 was trained in, I could see the numbers and that's  
23 it.

24 Q. Can you think of any way that the Central  
25 scanner would be able to come up with numbers without

\*\*\*\*\* C E R T I F I E D \*\*\*\*\*

Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 reading the ballots that it's scanning?

2 A. I don't understand your question.

3 Q. So you -- I believe you just said the ICC  
4 has numbers of votes, correct?

5 A. Numbers of votes, yeah.

6 Q. For different candidates; right? It counts  
7 the votes --

8 A. Yes.

9 Q. -- that go through it?

10 A. Correct.

11 Q. So would you agree that that has to mean  
12 it's reading the ballots that it's scanning?

13 A. Yes. Correct.

14 Q. So it reads the ballots and comes up with a  
15 total for the different races and it saves a picture  
16 of the ballot.

17 That's the ICC; correct?

18 A. Correct.

19 Q. But the ICP at the precincts, it -- we don't  
20 know -- you don't know whether it takes a picture of  
21 the ballot?

22 A. Yeah, I don't know.

23 Q. And that is how -- I'm sorry?

24 A. I said based on my training.

25 Q. Okay.

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. Yeah.

2 Q. So you don't know how provisional and  
3 emergency ballots are scanned or how they are  
4 adjudicated because there's no image; right?

5 A. Come again? Again, on adjudication I don't  
6 know. I wasn't trained on adjudication.

7 Q. So how do the -- so you said that the ICP  
8 has a CompactFlash card that stores the vote totals;  
9 right?

10 A. Correct.

11 Q. Does the ICC also have a CompactFlash card?

12 A. No.

13 Q. What does it use instead?

14 A. It stores -- it stores all the images and  
15 results in the C drive.

16 Q. And then -- so then what happens with the  
17 results? How do they get -- what's the next step  
18 after the scanning?

19 A. On the ICC or the ICP?

20 Q. Let's do the ICP first, the precinct  
21 scanner. What happens to the votes on the precinct  
22 scanner after the scanning is over after an -- at the  
23 end of election day?

24 A. The CompactFlash card comes back to Fulton  
25 County warehouse and it gets loaded up onto the

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Raffensperger

Deposition of  
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9/4/2020

1 server by the RTR application.

2 Q. Via the RTR application?

3 A. Yeah.

4 Q. And then what happens with the -- and do you  
5 do that or does someone else do that?

6 A. I do that. Fulton County employees, too,  
7 can do that, yeah.

8 Q. So you -- so how does that actually work?  
9 You get a CompactFlash card. What do you do with it?

10 A. So I hold the CompactFlash card -- Flash  
11 card in my hand. And there's a card reader attached  
12 to the workstation that's attached -- that's  
13 connected to the server. So all I do is just load it  
14 up on there, using the card reader, onto the  
15 workstation.

16 Q. And then does it download it automatically,  
17 the votes?

18 A. Automatically, yeah, it does.

19 Q. When you do that, do you have to be logged  
20 in as a user on the workstation?

21 A. Correct.

22 Q. When Fulton County employees do it, do they  
23 log in also?

24 A. Yes. Everyone has to log in, yeah.

25 Q. Does everyone have a different login?

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. No.

2 Q. So everyone uses the same login?

3 A. Yeah. It's small -- it's a workstation.

4 It's one -- they administer the workstation. It's  
5 right in the same cage as the server.

6 Q. Okay.

7 A. And that's what we use on election night to  
8 load up the CF card.

9 Q. So when you load the CF cards, you or a  
10 Fulton County worker logs into the workstation and  
11 uses the card reader to upload each card one by one?

12 A. Correct.

13 Q. When you are logged in, is the account that  
14 you're logged in as, does it have limited permissions  
15 or is it an administrator account?

16 A. It's an administrator account.

17 Q. So it can do anything at all on the server  
18 that it wants to?

19 A. No. You have to log on to the server  
20 because you're logged into your workstation.

21 Q. So that's different than logging into the  
22 server?

23 A. Correct.

24 Q. So the server has clients and you're logging  
25 into the workstation client?

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. Correct.

2 Q. But you're logging in as an administrator on  
3 the workstation?

4 A. Correct.

5 Q. And the workstation hardware is connected to  
6 the server hardware; correct?

7 A. Correct.

8 Q. Is that an Ethernet cable?

9 A. No -- yeah. Yeah, it's an Ethernet cable,  
10 but not connected to the Ethernet, yes.

11 Q. But it's connected through an Ethernet  
12 cable, the two devices?

13 A. Correct.

14 Q. Is there some kind of Ethernet hub that  
15 allows multiple workstations to be connected to the  
16 server hardware?

17 A. Correct.

18 Q. And is any of that equipment connected to  
19 the public Internet?

20 A. No.

21 Q. Does any of that equipment have WiFi?

22 A. No.

23 Q. So when you put the CompactFlash card into  
24 the workstation to upload the results from the  
25 precinct scanners, are you aware of whether there are

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 images on those CompactFlash cards or not?

2 A. No, because I wasn't trained that way, so I  
3 don't look out for it.

4 Q. So is it possible that there are images  
5 there that you just don't know about?

6 A. I don't -- like I said, again, I don't know.

7 Q. So is it possible that there are images  
8 there you don't know about?

9 A. I don't know.

10 MR. CRAWFORD: Object. He's already  
11 answered the question.

12 MR. MCGUIRE: Okay.

13 THE REPORTER: When you're ready and at  
14 your first opportunity, can we take a -- or  
15 a bathroom break or...

16 (Discussion ensued off the record.)

17 (Recess from 11:42 a.m. to 11:54 a.m.)

18 BY MR. MCGUIRE:

19 Q. Hi, Mr. Olomo. Do you understand you're  
20 still under oath?

21 A. Yes, I do.

22 Q. Okay, great.

23 And during the break did you speak to  
24 anyone?

25 A. Yes. I was on the phone with John Ross from

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Fulton County. He was just --

2 Q. Okay.

3 A. Yeah. He was telling me about L&A that's  
4 going on.

5 Q. Did you speak to him at all about your  
6 testimony so far in the deposition?

7 A. No.

8 Q. Did you speak to anyone else?

9 A. No. No one else.

10 Q. So have -- you have not spoken to anyone  
11 about your testimony during the break?

12 A. No.

13 MR. MCGUIRE: I want to show you a  
14 photo. I'm going to share my screen.  
15 Hopefully, it'll work again. We'll just  
16 give it a try.

17 And I'm going to ask you. There's a  
18 picture of people who were present on  
19 August 11th at the Fulton County warehouse.  
20 And I just want to make sure that we know  
21 who these people are. So I'm going to share  
22 my screen and ask you if you will take a  
23 look at these photos.

24 And I'm designating this as Exhibit 2.  
25 So let's hope that this actually comes up.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 (Plaintiffs' Exhibit No. 2 was marked  
2 for identification.)

3 BY MR. MCGUIRE:

4 Q. And do you see the photo there, Mr. Olomo?

5 A. Yes, I do.

6 Q. So do you see the woman in the striped shirt  
7 who is seated at the table?

8 A. Yes.

9 Q. Do you recognize her?

10 A. Yeah, I recognize her.

11 Q. Who is that woman?

12 A. I don't know her name, but she's from  
13 Dominion.

14 Q. So you -- did she speak to you at all on  
15 August 11th when she was there?

16 A. Yes, she did.

17 Q. Did she -- she did not tell you her name?

18 A. She did, but I'm very bad in like keeping  
19 people's names. I know faces, but not good at names.

20 Q. Do you know what her role was -- what her  
21 role is at Dominion?

22 A. No.

23 Q. Do you know what she was doing there on  
24 August 11th?

25 A. Yes, based on what she told me.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. What did she say she was there to do?

2 A. She said she was there to help with  
3 adjudication.

4 Q. To help with adjudication?

5 A. Correct.

6 Q. And did you observe her doing anything that  
7 night?

8 A. No -- you mean --

9 Q. Did you see what she was doing while she was  
10 there?

11 A. While I was there, she was just sitting just  
12 right -- right where she was sitting right in the  
13 picture.

14 Q. And is that spot there where she's sitting  
15 in the picture, is that where the adjudication was  
16 taking place?

17 A. No.

18 Q. So what was she doing at this point when  
19 this picture was taken?

20 A. She was just sitting.

21 Q. Nothing was happening that you are aware of?

22 A. No.

23 Q. I'm going to scroll down to the next page of  
24 this exhibit. And I'm going to try and make this  
25 bigger.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Do you see a picture of a man on his phone  
2 opposite the woman that we just talked about?

3 A. Yes.

4 Q. And do you recognize that person?

5 A. Yes, I do.

6 Q. Who is that?

7 A. That's Brad, my regional manager from  
8 Dominion.

9 Q. And what was he doing there on August 11th?

10 A. Based on what he told me was he came to ask  
11 if I needed any help.

12 Q. Did you call him and ask him to come or did  
13 he just come on his own?

14 A. He called me and I told him he could come  
15 because I had, like, two precincts that were  
16 complaining about ICP not working properly. So I  
17 told him to please run out to one of the sites while  
18 I go to the other one. So I guess he came back to  
19 the warehouse before I did.

20 Q. So he went to one of the polling places and  
21 you went to the other one?

22 A. Correct.

23 Q. And did he tell you what happened while he  
24 was at the other polling place?

25 A. Yes, he did.

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Deposition of  
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9/4/2020

1 Q. What did he say? What did he say happened?

2 A. It was a user error. It was scanning -- so  
3 it would have come in and was scanning -- tried  
4 scanning the ballots. That had hand sanitizer wipes.  
5 So the ballot was smeared, and she was trying to scan  
6 it through the ICP --

7 Q. So the --

8 A. Yeah.

9 Q. So the voters -- the voter had gotten the  
10 ballot messed up?

11 A. Wet. Yes.

12 Q. And that was the only problem that was going  
13 on at the other polling place?

14 A. And you mean where he went to or --

15 Q. Where he went to.

16 A. Yeah. That was what he told me, yes.

17 Q. Did anything -- did he do anything else  
18 while he was there that night August 11th?

19 A. Can you come again? You're breaking up.  
20 Sorry.

21 Q. I'm sorry. Did he do anything else that you  
22 observed while he was there on that night, August the  
23 11th?

24 A. At the warehouse?

25 Q. Yes.

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Curling v.  
Raffensperger

Deposition of  
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9/4/2020

1 A. Yes. When I came back, they were working on  
2 adjudication.

3 Q. He was working with --

4 A. Yeah. He was working with the lady in the  
5 first picture you showed me, on adjudication.

6 Q. Now, when you say they were working on an  
7 adjudication, what do you mean? What were they  
8 doing?

9 A. I mean, they were on the adjudication  
10 workstation just right by the server -- the server  
11 rack where those workstations were set up. So they  
12 were there working on adjudication.

13 Q. So just first, in this picture that's on  
14 your screen, is that the server rack that's over his  
15 shoulder in the corner there?

16 A. Correct.

17 Q. So is the adjudication workstation visible  
18 in this photo?

19 A. No.

20 Q. Where is it located?

21 A. Just to the right of the picture, yeah. To  
22 the right.

23 Q. So it's off the edge of the picture to the  
24 right?

25 A. Off -- yes.

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1 Q. Why -- now, when you say they were working  
2 on adjudication, do you mean that they were  
3 conducting adjudication or were they working on a  
4 problem with the adjudication?

5 A. So what I witnessed was they were working on  
6 the application. They were -- I think they were  
7 opening up the application when I was -- I just  
8 witnessed -- witnessed it. Like I walked by and I  
9 saw the adjudication application on the screen.

10 Q. Was there a problem with the adjudication  
11 application?

12 A. That, I don't know.

13 Q. But did you understand them to be working on  
14 something that was a software issue or did you  
15 understand them to be doing adjudication?

16 A. More -- I'll say from what I can see on the  
17 screen, yeah, more like a software problem, like an  
18 application software problem, yeah.

19 Q. But you don't know what the problem might  
20 have been?

21 A. No.

22 Q. Now, do you keep track of when things like  
23 adjudication are happening at the warehouse?

24 A. What do you mean, "keep track"? I'm not  
25 responsible for that.

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1 Q. Sure.

2 Are you aware of when adjudication is  
3 happening at the warehouse?

4 A. Yes. I get involved, yes.

5 Q. And you probably see people sitting at the  
6 workstations; right?

7 A. Correct. Yes.

8 Q. Just to finish up what we were talking about  
9 before the break, you had told me that the precinct  
10 scanner CompactFlash cards were brought to the  
11 warehouse, and they were entered into the RTR by you  
12 or a Fulton County person working at a workstation;  
13 is that right?

14 A. Correct.

15 Q. I'd like to talk about how the ICC vote  
16 counts that are on the C drive of the Central scanner  
17 get transported to the Fulton warehouse.

18 Do you -- can you tell me about that?

19 A. Yeah. So the Fulton County employee comes  
20 to the warehouse to pick up USB drive from the Fulton  
21 County warehouse. And they -- we have, like, two --  
22 in the Fulton County warehouse, Fulton County has  
23 two box -- like, two or three boxes of new USBs not  
24 been used, not ever been used.

25 So I give -- I'll -- sometimes they can ask

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1 for four USB drives or five, depending on how many  
2 high-speed scanners -- or how many scanners they used  
3 or how many tablets that was used.

4 So I give it to them, they go back to  
5 whatever scanning was taking place, and they bring  
6 back the results to the warehouse.

7 Q. So have you ever witnessed that process at  
8 the Central scanner?

9 A. Yes.

10 Q. So what do they do with the USB drive to get  
11 the data off of the scanner and onto the USB drive?

12 A. They plug in the USB drive and move the  
13 vote -- move the result from the -- one of the  
14 folders in the C drive, the DVS folder. They move  
15 the results, put it on the USB drive, and they bring  
16 the USB drive back to the warehouse.

17 Q. Now, is there a formal process for that?  
18 Like, are there steps that they're supposed to follow  
19 to move the files from the C drive to the USB drive?

20 A. You mean technically?

21 Q. Yeah. Is there like a step-by-step process?

22 A. Yes.

23 Q. Do you know what that process is?

24 A. Yes. Technically, I do.

25 Q. Can you just summarize it for me? What is

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9/4/2020

1 the process?

2 A. So the process is you go -- you plug in your  
3 USB drive. You go into your C driver. There's a  
4 folder in the C drive called the DVS folder. In the  
5 DVS folder, you have your -- the tablet -- you're  
6 trying to move the tablet or is -- where those  
7 results have been -- the result for that scanner has  
8 been saved.

9 So you go into that set folder, which is  
10 DVS, and you go under -- there's going to be like --  
11 what's it called -- it's another folder named Result,  
12 and you have to move that folder -- the Result folder  
13 onto the USB.

14 Q. And then are the images of the ballots in  
15 that same folder or is that a separate operation?

16 A. Yeah. That's -- if you want to get the  
17 images, then you don't -- you just don't move the  
18 results. You move the whole tablet or folder, like  
19 the whole thing. You move the whole thing. Like,  
20 when you go into the DVS, you move the whole folder  
21 right from the DVS.

22 Q. And that will copy everything?

23 A. Yes.

24 Q. Now, are you leaving it on the ICC C drive  
25 when you do that and just making a copy on the USB

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9/4/2020

1 stick?

2 A. Yes. Correct.

3 Q. So now it's in two places?

4 A. Correct.

5 Q. And when they do that, as part of the  
6 procedure where there are steps, are they supposed to  
7 copy the images or just the results?

8 A. Just the results.

9 Q. So -- and this is all on election night;  
10 right?

11 A. Again, that's a Fulton County thing, yeah.

12 Q. So as far as you know, when do the ballot  
13 images get brought to the warehouse?

14 A. Ballot images? Yeah. When they copy, if  
15 they need the images, then it's copied, the whole  
16 folder. That was -- because I learned that during  
17 training. And when I was asked the question by  
18 Fulton County, I gave that information.

19 Q. And don't they need the images always in  
20 order to do adjudication?

21 A. That, I don't know. Like I said, probably.  
22 I don't know about adjudication. I wasn't trained on  
23 adjudication.

24 Q. So have you ever been asked to help with  
25 adjudication problems or do they always bring in

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1 people like Brad and this woman to do that?

2 A. Yes, I've been asked. And all I do is -- so  
3 I've been asked at Fulton County to help out with  
4 adjudication. And the furthest I could go with  
5 adjudication was me making sure the application  
6 was -- had the correct license pulling from the  
7 server.

8 And as soon I opened up the application, I  
9 turned it over to the chief of election and  
10 registration to take over because I don't know how  
11 to -- what to program from there.

12 Q. So you don't run -- you don't know how to --  
13 and what's the adjudication program called? Is that  
14 different from the EED and the RTR?

15 A. Yes.

16 Q. So it's a third program?

17 A. Yes. Correct.

18 Q. But that's not one that's under your  
19 responsibilities?

20 A. Yeah. But I -- it's under my  
21 responsibilities, but I don't -- I wasn't trained on  
22 it.

23 Q. So if you have to provide help on it, you  
24 have to call someone else at Dominion?

25 A. Correct.

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1 Q. And is the person you call Brad?

2 A. Yes.

3 Q. So -- all right. I think you've answered  
4 this, but I just want to make sure I understand.

5 So you don't -- you don't know how the  
6 images get from the scanners to the server for  
7 purposes of adjudication; is that right?

8 A. No. Come again. I don't --

9 Q. I'm just trying to, like, make sure I  
10 understand.

11 I understand you to be saying that you do  
12 not know how the images of ballots that have been  
13 scanned get transported and loaded onto the EMS  
14 server for purposes of adjudication; is that right?

15 A. No. (Audio distortion.)

16 Q. Sorry. You're cutting out a little bit.  
17 Can you start over? You cut out a little bit.

18 A. Okay. Yes. So what I said is Fulton County  
19 asked me if there's a way they could get images from  
20 the Central scanner. And based on my training, I was  
21 taught that.

22 And I gave that information to them, if you  
23 need to get the images plus the results, you have to  
24 copy the whole folder. That way you have everything  
25 that was scanned in, both the results, the images.

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1 And that was what I passed on to Fulton County.

2 So, yes, I do know how those images go from  
3 the scanner onto the USB and onto the server. But as  
4 to the adjudication, I don't know how to  
5 adjudicate -- I don't know how to -- the adjudication  
6 software.

7 Q. Okay.

8 A. Yeah.

9 Q. So I'm a little confused by that.

10 So what you're saying then is that you know  
11 that Fulton County copies -- you told them how to  
12 copy the images?

13 A. Correct.

14 Q. And so when they bring the USB drive back  
15 from the ICC, if they do what you've told them they  
16 can do, then that USB drive will have images on it,  
17 but that's up to them?

18 A. Correct.

19 Q. And you don't know how images -- if images  
20 from the ICP precinct scanners, if those images are  
21 even saved by the precinct scanner?

22 A. Yes. Correct.

23 Q. Have you ever uploaded images onto the  
24 server or the adjudication software?

25 A. Upload. Come again. Like, technically?

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9/4/2020

1 Q. Well, just I'm wondering if you've ever  
2 actually done it. Have you ever received a  
3 CompactFlash card or USB stick with images on it that  
4 you've then uploaded onto the server?

5 A. Yes.

6 Q. Did you do that in the recent election?

7 A. Yes.

8 Q. Did you do that on election night?

9 A. No.

10 Q. When did you do it?

11 A. That was -- I can't remember. It was a  
12 Friday, but I don't remember the actual date, but I  
13 remember it was a Friday. They had -- they still had  
14 some absentee ballots to be scanned, so it was  
15 scanned, and it came in by adjudication.

16 Q. And who brought you the USB stick or the  
17 CompactFlash card?

18 A. It's always a USB when you're doing  
19 adjudication.

20 Q. Okay.

21 A. And it was Mr. Ralph Jones. That is the  
22 chief of elections and registration.

23 Q. And so on election night when you are  
24 loading information in, it's always only the results?

25 A. On the CompactFlash card, yes.

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1 Q. And on the USB stick as well or no?

2 A. On the USB, I didn't do -- I didn't -- the  
3 last election I didn't load any results on the USB.

4 Q. That was done by Fulton County people?

5 A. No. That was -- I don't know who did that.  
6 I wasn't -- I don't know. I can't say.

7 Q. You didn't see that happen?

8 A. I didn't see that happen, yeah.

9 Q. But if it wasn't you, it would have to be  
10 Fulton County people; right?

11 A. Like, again, I can't say for sure.

12 Q. And just to make sure I understand this as  
13 well, so the ICC scanner has a folder that saves  
14 results, and that's what the Fulton County people put  
15 onto a USB stick and bring to the warehouse on  
16 election night?

17 A. Correct.

18 Q. I would like to ask you if you could tell  
19 me -- we obviously looked at photos, those -- that  
20 photo I showed you earlier that showed the server  
21 rack. And you have described a little bit about the  
22 Fulton County warehouse at English Street. I want to  
23 make sure I understand what equipment is used there  
24 on election night.

25 So I think you've told me there is a rack

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1 with a server in it?

2 A. Correct.

3 Q. There are five workstations that are  
4 connected to the server by an Ethernet cable through  
5 a hub?

6 A. Correct.

7 Q. Is there any other equipment that is used  
8 with that setup?

9 A. Just we have one IC -- they have the ICC  
10 screen. It's called all-in-one. That's used along  
11 with the high-speed scanner.

12 Q. That's a screen? Is that how you -- I mean,  
13 what does that screen show? What's on that screen?

14 A. Okay. So the screen is just like what you  
15 said, like the high-speed scanner. That's where you  
16 get -- it's the only one. It has both -- your, like,  
17 normal computer will have a screen and a CPU, so this  
18 has the CPU and everything embedded in it, so --

19 Q. Oh, I see. Okay. So, yeah, actually, let  
20 me step back then.

21 Going back to the ICC. So the scanner  
22 itself is a device, but it's also connected to an  
23 all-in-one computer called the ICC --

24 A. Yeah. It's the ICC all-in-one. We call it  
25 all-in-one, yeah.

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1 Q. So -- but there are two devices. There is a  
2 scanner and there is a computer, which is a screen?

3 A. Correct.

4 Q. And that's -- and so when they go in and  
5 they put the USB stick in, they are actually using  
6 just the Windows file system to cut and paste and  
7 copy --

8 A. Correct.

9 Q. -- to the USB?

10 A. Correct.

11 Q. And so you have an identical -- or another  
12 one of those at the warehouse.

13 Is it attached to the server or connected to  
14 the server?

15 A. Yes, it is connected to the server.

16 Q. And what is the purpose of having that  
17 separate computer be connected to the server?

18 A. Yeah. It's just we use that mostly during  
19 L&A, if we're doing L&A.

20 Q. Oh, you mean you use it -- so you test the  
21 scanner?

22 A. Yes.

23 Q. What -- is that the same kind of computer  
24 that's used with the precinct scanners?

25 A. What do you mean "precincts scanners"?

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1 Q. Do the precinct -- do they have a computer  
2 attached to them or are they just scanners?

3 A. You mean at the different locations,  
4 precincts?

5 Q. Yes. Yes.

6 A. They do not. They do not.

7 Q. Do not have a computer?

8 A. No.

9 Q. Okay. So you can do testing on those  
10 without a computer attached.

11 You can do logic and accuracy testing with  
12 the precinct scanners without a computer attached?

13 A. Yes. The ICP unit.

14 Q. Yes.

15 A. Correct.

16 Q. So you have the rack with a server in it and  
17 with an ICC computer in it?

18 A. Correct.

19 Q. And you have five workstations.

20 Is there any other equipment that you have  
21 as part of that setup on election night?

22 A. No.

23 Q. And are all of -- the workstations obviously  
24 are not inside the rack; correct?

25 A. Correct.

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1 Q. So they are outside the cage?

2 A. Correct.

3 Q. But they have an Ethernet cable that runs to  
4 a USB switch or a hub; right?

5 A. Yes.

6 Q. And is that USB hub or is that Ethernet hub  
7 inside the rack or outside the rack?

8 A. Inside the rack.

9 Q. Is it assessable from outside the rack?

10 A. No. You have to go inside the rack to do  
11 that.

12 Q. And I think you said earlier, but I want to  
13 confirm.

14 Is there any way to access any of the  
15 equipment inside the rack either by plugging in  
16 storage devices or by plugging in cables from outside  
17 the rack?

18 A. If the rack is closed, no.

19 Q. So the rack has to be open in order to get  
20 it -- get access?

21 A. Correct.

22 Q. Does it open in the front and in the back or  
23 just in the front?

24 A. Both in the front and the back.

25 Q. And let's see. Okay.

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1           So once the results on election night are  
2 put onto the server -- and you said you sometimes  
3 take part in that and you sometimes don't?

4           A. Right.

5           Q. What else do you do on election night?

6           A. That's it. I just make sure -- yeah.  
7 Results -- you know, print out results and put a copy  
8 of the result on the USB to be loaded by the Fulton  
9 County warehouse manager on ENR.

10          Q. And you said you don't know -- you don't --  
11 you aren't really -- you're responsible for the  
12 adjudication process, but you haven't been trained on  
13 that; correct?

14          A. Yeah.

15          Q. So if you are asked for help, then it's very  
16 limited what you can do?

17          A. Correct.

18          Q. Do you have administrator access to the EMS  
19 server?

20          A. Correct.

21          Q. The hardware?

22          A. Correct.

23          Q. So you log in through a Windows  
24 administrator account; correct?

25          A. Yeah.

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1           You're breaking up.

2           Q. I'm sorry.

3           So you log in through a Window's  
4 administrator account on --

5           A. Correct.

6           Q. And when you do that, you said earlier that  
7 the people who are doing the adjudication are on  
8 client workstations. They're not logging into the  
9 server; right?

10          A. Correct.

11          Q. But when you log into the server, do you do  
12 that through a workstation or some other way?

13          A. Yeah. So, yeah, the server screen -- just  
14 the screen from one of the workstations. And that  
15 workstation is the one in the rack with the server.

16          Q. So one of the clients is inside the rack and  
17 that one is -- actually lets you log into the -- or  
18 one of the client devices lets you log into the  
19 server?

20          A. No.

21          Q. Okay.

22          A. It shares the same screen with the server,  
23 just the screen.

24          Q. Oh, it shares a screen. I see.

25                So how do you -- you just switch back and

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9/4/2020

1 forth between the server and the client computer if  
2 you want to use one or the other?

3 A. Yes.

4 Q. How do you do that switch? Is there a  
5 physical switch?

6 A. No. I have to just -- one is connected by a  
7 display cable, and the other by an LBGA, so...

8 Q. So if you want to work on the server  
9 hardware, you'll take out the connection to the  
10 monitor and plug in the connection from the server?

11 A. Correct.

12 Q. And then when you want to turn it back into  
13 a workstation, you take out the connection to the  
14 server and plug in the connection to the client  
15 hardware --

16 A. Yes.

17 Q. -- client computer?

18 A. Yeah. That's the screen. Again, the  
19 screen.

20 Q. But it's just a screen?

21 A. Yes.

22 Q. All right. When you're working on the EMS  
23 server, what kinds of things would cause you to need  
24 to work on the EMS server on election day?

25 A. No. Really, I don't go on the EMS server on

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9/4/2020

1 election day.

2 Q. If there's a problem with the RTR or the EED  
3 or the adjudication software, that has to be resolved  
4 by going onto the server hardware; right?

5 A. Again, I've never had -- encountered a  
6 problem with that, so I wouldn't -- like, I can't  
7 answer that.

8 Q. So have you ever logged into the EMS server  
9 as an administrator?

10 A. Yes.

11 Q. To do what?

12 A. To -- when I first -- when I was setting up  
13 those client stations, I had to, like --  
14 (unintelligible) -- people that are here, yeah.

15 And when the adjudication was -- was -- how  
16 do I put this. Like, when I will head up the  
17 application, so I have to go in to make sure they all  
18 have a right.

19 Q. I'm sorry. Say that last part again.

20 A. Yeah. So I went back into the EMS server to  
21 make sure they all have rights as users to access the  
22 adjudication license.

23 Q. Meaning that each of the workstations has  
24 the right to access it?

25 A. Yes. As a user.

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1 Q. As a user.

2 Because the workstations are clients of the  
3 server?

4 A. Correct.

5 Q. So they have to have authorization to be  
6 clients --

7 A. Correct.

8 Q. -- when you set that up on the server  
9 itself?

10 A. Correct.

11 Q. So apart from what sounds like initially  
12 setting up permissions to access the server, is there  
13 any other thing that would ever cause you to log into  
14 the server as an administrator?

15 A. Yeah. Like, if I am to pull logs.

16 Q. And when you say "pull" -- when you say  
17 "logs," what are you referring to?

18 A. Say event logs. So that gives me, like, a  
19 window of what happened and -- if I'm getting an  
20 error message or something, but...

21 Q. So if the server is having a problem, you'll  
22 look at the logs on the server to see what has  
23 happened?

24 A. Correct.

25 Q. And anything else besides looking at logs

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1 and setting up clients?

2 A. That will be all. No. That's all.

3 Q. So, basically, aside from setting up clients  
4 at the outset, basically, you only look -- you only  
5 log into the server to look at the logs; is that  
6 right?

7 A. Correct.

8 Q. And how often does that happen?

9 A. It only happened once that I can -- twice.  
10 Twice that I can recall, yes.

11 Q. What were those two occasions?

12 A. When Derrick asked me to get him the  
13 server -- the log files from the EMS server. The  
14 first time I gave him from the beginning of time to  
15 election night, which was August 11th.

16 And he got back to me like that wasn't what  
17 he wanted. He wanted till the present time. So I  
18 had to go back in to get those log files and...

19 Q. So you -- so those are the two times that  
20 you have done this?

21 A. Yes. Correct.

22 Q. So the first time Derrick Gilstrap asked you  
23 to get him the log files from the beginning of time  
24 until August 11th?

25 A. Yeah. That was -- that was my

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 interpretation of what was asked --

2 Q. Okay.

3 A. Yeah.

4 Q. And when did -- was that on August 11th that  
5 that happened?

6 A. No, no, no. That was after August 11th.

7 Q. So do you remember what -- when that  
8 happened?

9 A. I can't recall the date.

10 Q. So you haven't -- you didn't pull any logs  
11 on August 11th?

12 A. No, I did not.

13 Q. Now -- and the second time, was that the  
14 same day, the second time you went in to get logs for  
15 Derrick?

16 A. No, no. It was like two days after -- was  
17 it two days? Yeah. I can't remember, but it was not  
18 the same day. Definitely not the same day, no.

19 Q. So he decided what you gave him wasn't what  
20 he wanted?

21 A. Yes.

22 Q. And he asked you to give him something  
23 different?

24 A. Not something different, just different  
25 dates from the beginning of time to the present

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 moment.

2 Q. Okay.

3 A. I didn't -- I stopped at August 11th, but he  
4 wanted me to go further than that.

5 Q. He wanted you to go further than August  
6 11th?

7 A. Correct.

8 Q. And you think that -- and so -- and you  
9 don't remember what date he wanted you to go up  
10 until?

11 A. No. Until the present time.

12 Q. Okay.

13 A. You know, until the -- you know, until the  
14 morning of that -- I call it present time. Like  
15 until this very moment, so...

16 Q. But you don't remember what day that was?

17 A. No, I don't.

18 Q. So -- all right. So do you recall that we  
19 had an expert named Harri Hursti visit the warehouse  
20 on August 11th, on election night.

21 Do you remember our person coming to  
22 observe?

23 A. I know people come to observe. I don't know  
24 who hired them.

25 Q. So I will represent to you that Harri

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Hursti, who is out expert -- one of our expert  
2 witnesses came to observe on the evening of August  
3 11th. And he observed some -- what appeared to be  
4 troubleshooting activity after 8:00 p.m. -- around  
5 8:00 p.m.

6 Does that sound like something you remember  
7 seeing?

8 A. On election night?

9 Q. On August 11th, yes.

10 A. Not with me. I didn't troubleshoot on  
11 election night.

12 Q. Do you remember there being any issues that  
13 require troubleshooting from any of your other  
14 Dominion colleagues on August 11th?

15 A. Yes. Brad, who was my regional, asked me,  
16 like, how do -- like, how can he get into the EMS  
17 server. And I -- you know, I showed him how and that  
18 was it.

19 Q. Did he say why he needed to get into the EMS  
20 server?

21 A. No.

22 Q. And do you remember was anything going on  
23 that you were aware of as a problem?

24 A. No.

25 Q. Had you -- had anyone reported a problem to

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 you?

2 A. I just -- he -- I overheard him saying over  
3 the phone, like, I think the passwords were wrong  
4 and --

5 Q. Okay.

6 A. Yeah. I overheard him talking about the  
7 phone. And I asked him -- I go to him, like, what  
8 password are you talking about?

9 And later on -- he didn't answer me at  
10 first, but later he came to me and said, I'm sorry.  
11 Everything looks right.

12 I was like, okay. But I didn't -- but I  
13 didn't go further because I didn't ask him, like, why  
14 are you trying to -- why are you saying the passwords  
15 was wrong because --

16 Q. Okay.

17 A. Yeah.

18 Q. And about what -- so he just -- he came to  
19 the warehouse and then he tried to get into the  
20 server and he had a password problem. And so he  
21 called someone about that.

22 Is that what your -- is that what I  
23 understand happened?

24 A. Okay. So what happened, again, when I was  
25 walking by the server -- because then it was like

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 6:30 and I was trying to, like, make sure most of --  
2 like, all the voting sites were closed, so we could  
3 start loading all the CF cards.

4 But I overheard him by the phone talking. I  
5 don't know what he --

6 THE REPORTER: Slow down. Slow down.  
7 Slow down. Slow down, please.

8 THE WITNESS: All right.

9 So I walked by the server and I  
10 overheard him talking on the phone. I don't  
11 know who he was on the phone with. But I  
12 overheard him saying the password was wrong.

13 So I -- then I asked him, like, What  
14 password are you talking about? He didn't  
15 respond to me.

16 But later on he came to me and said, Oh,  
17 I'm sorry. The passwords were right.  
18 Everything was right.

19 But I didn't ask him why or what was  
20 going on and he didn't tell me, so I left it  
21 that way, yeah.

22 BY MR. MCGUIRE:

23 Q. So based on what you saw, did he appear to  
24 be troubleshooting something at the server?

25 A. Again, I was fully concen- -- like, focusing

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 on closing those early voting sites to start loading  
2 up, you know, the CF cards because, you know, when --  
3 we trying to get the results out as soon as possible.

4 Q. And when he was looking for a password, you  
5 assumed it -- did you understand him to mean the  
6 password to log into the EMS server?

7 A. Again, he was sitting by the workstation.  
8 That's why I asked him, like, what password, and he  
9 didn't answer. He didn't respond to me.

10 Q. Did you ever see him log into the EMS  
11 server?

12 A. No.

13 Q. When you do need to log into the EMS server,  
14 how do you -- how do you do that?

15 A. So when I go to Fulton County -- what I  
16 did was -- because the server, to make it secure, I  
17 took out -- there wasn't a keyboard or mouse attached  
18 to the server, to the machine itself, to the  
19 hardware. So you -- for you to log into it, you need  
20 to, you know, manually go to the back, attach it a  
21 USB-type mouse or keyboard for you to type in those  
22 passwords. So I made sure that, like, I took those  
23 out.

24 So if I need to go get into the server, I  
25 need to go to the back and attach a keyboard or a

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 mouse to it for me to be able to log in.

2 Q. And did you see Brad doing that?

3 A. No. But when he asked me, like he was  
4 trying to get into the server, I did that for him.  
5 But I didn't see him physically go into the -- like,  
6 you know, log into the server.

7 Q. So you -- when he asked you about the  
8 password, you took it to mean he wanted to log into  
9 the server and you attached the keyboard and mouse?

10 A. No.

11 Again, okay, I told you. I said I overheard  
12 him over the phone talking to someone about the  
13 password. The only thing he asked me when I walked  
14 into the warehouse was, How can I get into the  
15 server?

16 And I said, Oh. And I walked to the back, I  
17 switched the screen and I put in the keyboard and the  
18 mouse for him.

19 Q. Okay. Yeah.

20 And that happened before you heard him on  
21 the phone?

22 A. Correct.

23 Q. So he arrived and told you he wanted to get  
24 into the server?

25 A. Correct.

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. Did not say why?

2 A. No.

3 Q. And you attached a keyboard and mouse and a  
4 screen for him?

5 A. Correct.

6 Q. And then, thereafter, you heard him on the  
7 phone with someone talking about the password being  
8 incorrect?

9 A. Correct.

10 Q. But he later told you that the password was  
11 correct?

12 A. Correct.

13 Q. And at no point during all of this did he  
14 explain what he was doing in the server?

15 A. No.

16 Q. And you did not ask?

17 A. I didn't ask because it was -- I didn't -- I  
18 didn't ask, yeah.

19 Q. Were there any Fulton County people with him  
20 watching him, talking to him?

21 A. I don't recall. I can't -- you know,  
22 because, again, I was totally distracted by, you  
23 know, trying to close those other voting sites  
24 because Derrick had told me to make sure that that  
25 happened before 7:00.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. Now, at some point did you -- and when you  
2 pulled logs -- let me back up.

3 Our person, our expert Harri Hursti who came  
4 that night, he has testified that you gave him log  
5 files from the server.

6 Do you remember that?

7 A. I didn't give it to him. I gave it to  
8 Derrick.

9 Q. And then -- okay. So he may have gotten it  
10 from Derrick, but you would have pulled the file,  
11 then Derrick would have given it to Harri?

12 A. I wouldn't know that, but I gave it to  
13 Derrick. So --

14 Q. Okay.

15 A. -- whatever Derrick does with it --

16 Q. And is it possible that that is the request  
17 that you said Derrick was making to you was so he  
18 could give those files to our expert?

19 A. Again, I wouldn't know. Yeah, I don't know.

20 Q. You don't know either way?

21 A. Huh-uh.

22 Q. Do you recall answering any questions that  
23 Mr. Hursti had about what you were doing behind the  
24 server rack that night? Do you remember -- do you  
25 remember talking to Mr. Hursti about that?

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. You're breaking up.

2 Q. I'm sorry.

3 Do you remember talking to Mr. Hursti at all  
4 about how the server was set up?

5 A. When? On election night?

6 Q. Yes. On election night, August 11th.

7 A. Again, I want to make sure we're talking  
8 about the same person here. Because I remember like  
9 Marilyn usually comes with another person.

10 Is that the person -- is that Mr. Hursti?

11 Q. All right. I assume that night -- let me  
12 represent that it was Mr. Hursti on election night  
13 August 11th.

14 A. Okay.

15 Q. So did you speak to him?

16 A. Yes, I did.

17 Q. And do you remember what he wanted to ask  
18 you?

19 A. Yes, I remember. He was asking -- he wanted  
20 to know if the server was in any way connected to  
21 public Internet or to the outside. And I explained  
22 to him, but better thing -- better way, I took him to  
23 the back of the rack for him to see things himself.

24 Q. You did take him to the back to let him see?

25 A. Yes, I did.

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. And was that -- was Brad still working on  
2 the EMS server at that time or was that over?

3 A. I don't -- I don't remember. I can't --  
4 yeah. I don't remember.

5 Q. Was he back there? Was he back there when  
6 you showed Mr. Hursti the back of the server?

7 A. You mean in the warehouse or the back of the  
8 server?

9 Q. Was he back there on the keyboard and mouse  
10 that you had set up?

11 A. I don't recall. I don't.

12 Q. So did you ever get on the phone to anybody  
13 from Dominion on the night of August 11th?

14 A. No. No.

15 Q. As far as you know, was the -- was the  
16 problem or whatever issue Brad was looking into, was  
17 it resolved on election night?

18 A. Again, I didn't know he was having -- like,  
19 I don't -- he didn't tell me about having issues  
20 like, you know, what was going on. So I didn't ask  
21 because it wasn't -- yeah. So I didn't know.

22 Q. Now, you are the only -- you've testified  
23 you're the only person from Dominion who works with  
24 Fulton County on a regular basis at the warehouse;  
25 right?

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Raffensperger

Deposition of  
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9/4/2020

1 A. Correct.

2 Q. So is it unusual for people from Dominion to  
3 come and work on the server without advising you  
4 about what's going on?

5 A. Again, I'm just a contractor with Dominion.  
6 And they have -- I'm not an employee. They don't  
7 need to like, you know, let me know prior that anyone  
8 is coming. It's their property. I'm not trying to,  
9 you know, hide anything, you know.

10 Q. Sure.

11 But is it unusual for that to happen or does  
12 this happen -- is this -- is this unusual? Was this  
13 an unusual event?

14 A. I'll say no, you know, because I -- again,  
15 that's -- that was the first time we did  
16 adjudication, so I believe they came, you know, to  
17 help out with adjudication, which I don't know about.

18 Q. So what makes you think that it had to do  
19 with adjudication?

20 A. I think -- I said because -- that's why the  
21 lady you showed me the picture of came in, so...

22 Q. And you think that that was the reason Brad  
23 was trying to get into the server?

24 A. That, I don't know. I didn't see that. I  
25 just know, like, that was why the lady came.

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Raffensperger

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9/4/2020

1           Your question was why -- why Brad and the  
2 lady came to the warehouse on election night and that  
3 was my answer.

4           Q. Was the woman who came with -- did she come  
5 with Brad or separate from Brad?

6           A. Separate from Brad.

7           Q. Did he have any access to the EMS server  
8 that night?

9           A. No. None -- not to my knowledge, no. No.  
10 Because when I came -- the only time I saw her, when  
11 she was working on the workstation, the adjudication  
12 workstation, so...

13          Q. So when you -- when you pulled the logs for  
14 Derrick Gilstrap from the beginning of time to  
15 August 11th, how -- when you say the beginning of  
16 time, what does that mean?

17          A. I mean beginning of time when the logs have  
18 been -- when the logs have existed, you know, like  
19 the first time. I didn't check the dates. All I did  
20 was download till August 11th.

21          Q. Did you -- so you didn't -- you didn't look  
22 at the contents of the logs at all?

23          A. No, I did not.

24          Q. Did you -- when you downloaded them, how did  
25 you store them to remove them from the server?

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Curling v.  
Raffensperger

Deposition of  
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9/4/2020

1           A. Again, Fulton County has two boxes of about  
2 five hundred each -- in each box of USB. So anytime  
3 I want to pull any data from the server, I use a new  
4 USB each time. And I don't -- I don't format it. I  
5 don't do it. When I'm done with it, I have a tray  
6 that I put them in.

7           Q. So you -- does that mean you put copies of  
8 the logs onto the USB drive?

9           A. Correct.

10          Q. And you were instructed to download the logs  
11 from the beginning of time -- the first time you  
12 understood that you were instructed to download the  
13 logs from the beginning of time until August 11th;  
14 correct?

15          A. That was my interpretation of it.

16          Q. Yeah.

17          A. Yes.

18          Q. And is that what you did?

19          A. Yes.

20          Q. How did you cut it off at August 11th? Is  
21 there a --

22          A. Yeah, yeah. You can -- I can download it.  
23 I can filter it.

24          Q. So there's a software application that lets  
25 you produce the log file?

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. No.

2 Q. How did you filter it?

3 A. No. You can -- when you go onto the Event  
4 Viewer, when you log in, you can see how -- what are  
5 you trying to see, what data are you actually trying  
6 to see, you know. So that was what I did.

7 I -- (unintelligible) -- and I downloaded  
8 everything I had --

9 THE REPORTER: Okay. Slow down. Thank  
10 you. It's starting to roll together.  
11 Beautiful accent, but it's hard to follow.

12 THE WITNESS: Yeah. So what I did was I  
13 did -- because when I saw August 11th so --  
14 because prior to August 11th, no one had  
15 logged nothing into the server.

16 So what I did was -- when I logged into  
17 the server, all I did was just download what  
18 I had prior to my, you know, session that I  
19 was right now at that very moment. So I did  
20 until August 11th.

21 Then when Derrick had told me, like, you  
22 need to download what you had from August 11  
23 until now, then I went back to download  
24 everything because he needed everything.

25 BY MR. MCGUIRE:

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. And when we talk about log files, what is  
2 recorded -- first of all, is that a Windows log or is  
3 that a Dominion program log?

4 A. It's a Windows log.

5 Q. So you're downloading a log of events that  
6 Windows has recorded?

7 A. Correct.

8 Q. And does that record events that happened  
9 with the Dominion EMS software on the server?

10 A. Correct.

11 Q. So it's logging everything --

12 A. It's logging --

13 Q. -- correct?

14 A. Yes.

15 Q. Now, do those logs -- is there some maximum  
16 size for those logs or do they just record forever  
17 until they get too big to have any space?

18 A. Yeah. They just get recorded, yeah.

19 Q. So is there any reason why the log would  
20 have gaps in it?

21 A. Not to my understanding, no.

22 Q. You didn't do anything that would have  
23 created gaps in the log?

24 A. No.

25 Q. So when you got the USB stick with the logs

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Curling v.  
Raffensperger

Deposition of  
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9/4/2020

1 on them the first time, what did you do with the USB  
2 stick?

3 A. I took it to Derrick's office and I hand it  
4 over to Derrick.

5 Q. And did you do anything else with it?

6 A. No. Not the first time, no.

7 Q. Did you see anybody else do anything with  
8 it?

9 A. No, no.

10 Q. So when Derrick got back to you a couple of  
11 days later and -- or a few days later, sometime  
12 later, and told you he wanted actually to take logs  
13 from the beginning of time to the present, did he  
14 give you back the same USB stick?

15 A. No.

16 Q. So did you get a fresh one?

17 A. Yes.

18 Q. And when you -- did you go through the same  
19 process of going into Windows and just using the  
20 Windows Event Viewer to get the log onto the USB  
21 stick?

22 A. Correct. Yeah.

23 Q. And this time you didn't filter it at all?

24 A. I didn't, no. Nothing.

25 Q. So everything that ever happened on that

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 machine should be in the log?

2 A. Correct.

3 Q. And the second time, what did you do with  
4 the USB stick?

5 A. So the second time that was -- that --  
6 coincidentally, that happened to be the last day they  
7 came in for adjudication. So when we're trying to  
8 like pull up ballot images on the adjudication  
9 workstation, the ballots were giving us an error like  
10 it can pull the image from -- from the server.

11 So what I did was I called Dominion, and I  
12 tried to explain what I was -- you know, the  
13 situation. They couldn't really understand what I  
14 was saying. So I know like, you know, technically  
15 what you can do for someone to like understand what's  
16 going on is like you could pull the log and let them  
17 see the error message. They will get it.

18 So I pulled the log file, and it was the  
19 same -- exact same log file I gave to Derrick. I  
20 took one to Dominion for Mitch to take a look at it.

21 Q. And that was on a different USB stick?

22 A. On a different USB stick, correct.

23 Q. So you pulled the log file for -- the second  
24 log file for Derrick before you pulled the log file  
25 for Dominion; correct?

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1           A. Yeah. It's the same thing because -- so  
2 when you pull a log file, you can either -- you save  
3 it. You just don't -- you don't dump it on the USB.  
4 You have to save it probably in one of your folders.  
5 So I saved it on the desktop. It was -- the same  
6 folder I gave to Derrick was the same folder I took  
7 to Dominion.

8           Q. So you used the Windows Event Viewer to  
9 export the log to a file on the server?

10          A. Correct.

11          Q. And then you copy that file onto a USB  
12 stick?

13          A. Correct.

14          Q. And you took the USB stick away. And  
15 meanwhile, the file is still sitting there?

16          A. Correct.

17          Q. And so then when Dominion wanted a copy, you  
18 just copied that file onto a different USB stick?

19          A. Correct.

20          Q. And then how did you get that to Mitch? Did  
21 he come pick it up?

22          A. No. I drove down to Dominion.

23          Q. And this was while there was adjudication --  
24 an adjudication issue going on?

25          A. Correct.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. And who was in the warehouse at that time  
2 from Dominion?

3 A. Just me.

4 Q. Just you, okay.

5 So who was dealing with the adjudication  
6 issue? Just you?

7 A. Yeah, just me.

8 Q. And what date was this? Do you remember?

9 A. No. It was -- I don't remember. I don't.

10 Q. It was not election night, though?

11 A. Definitely not election night.

12 Q. It was after election night?

13 A. After election night, yeah.

14 Q. So do you -- do you understand what would be  
15 recorded in the log files? Like, if you looked at  
16 it, would you be able to tell if something was  
17 unusual?

18 A. Yeah. You have error messages, yeah.

19 Q. And just to be clear, is there any way for  
20 the log file to be generated by someone who is not  
21 physically typing on a keyboard attached to the  
22 server hardware?

23 A. Not to my knowledge.

24 Q. So no one has ever, to your knowledge,  
25 logged in remotely from Dominion to the server?

\*\*\*\*\* C E R T I F I E D \*\*\*\*\*

Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 A. No. Not to my knowledge, no.

2 Q. So if they need to get something off the  
3 server, they physically come down and do it or they  
4 ask you to do it?

5 A. Correct.

6 Q. And that's -- that's never -- there is never  
7 any other way that that happens?

8 A. Any other way? You mean remotely?

9 Q. Yes.

10 A. No.

11 Q. Now, have you ever yourself looked at logs  
12 to try and figure out a problem that you're trying to  
13 solve on the server?

14 A. On the server?

15 Q. Yeah.

16 A. I just look at it, if it makes sense to me.  
17 You know, but most of the time it doesn't because, I  
18 mean, I was -- (unintelligible). So I could look at  
19 it all day long; I can't do nothing about it.

20 Q. I guess I'm just -- what I'm trying to get  
21 at is so you told us that there were two times when  
22 you actually pulled a log, which I take to mean put a  
23 log on a USB stick and took it off the server.

24 But have you ever actually looked at logs  
25 and not copied them off the server but just looked at

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Raffensperger

Deposition of  
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9/4/2020

1 them to figure out what's going on?

2 A. Yeah. Just the same day I pulled the logs,  
3 both logs, one to Dominion and the one to Fulton  
4 County, I just -- I looked at the logs just to see if  
5 it made sense to me, but it didn't, so...

6 Q. And that was because you were trying to  
7 figure out what the problem was on your own?

8 A. Yes.

9 Q. And, once again, what date was that? Do you  
10 know?

11 A. I don't recall what date.

12 Q. Did you -- when you gave the USB stick to  
13 Derrick either time, was there anyone else there?

14 A. I don't recall. No. I -- no, I don't  
15 recall.

16 Q. Did -- is it possible that there was or do  
17 you believe there wasn't?

18 A. Again, I can't really say.

19 Q. And when you pulled the logs and looked at  
20 them the second time, did you notice that there were  
21 error messages in the logs?

22 A. Yeah. I saw the error messages, but like I  
23 said, I don't -- I didn't understand what they meant,  
24 so that's why I had to copy it and take them down to  
25 Dominion for someone to interpret it.

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Raffensperger

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9/4/2020

1 Q. Okay. Okay. Great.

2 So I want to ask you just a couple of  
3 specific questions about August 11th, election night,  
4 the runoff election night.

5 I'm going to -- I'm just going to represent  
6 to you that the logs that we got, which I guess were  
7 the first -- the first logs you pulled stopped at  
8 5:31 on election night.

9 Does that seem right to you, given when you  
10 pulled the logs?

11 A. Again, when I pulled the logs, I didn't take  
12 a look at them.

13 Q. Okay.

14 A. I didn't look. I just copied and moved it  
15 over to the USB.

16 Q. Because you didn't pull the logs on election  
17 night; right?

18 A. No, I did not.

19 Q. So it was later?

20 A. Yes.

21 Q. But when you pulled the logs, they were  
22 supposed to go all the way through August 11th, so  
23 would you have expected them to go all the way to the  
24 end of August 11th?

25 A. Yes. Yes.

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9/4/2020

1 Q. And are you aware of anything that happened  
2 around 5:00 p.m. on election night that would have  
3 produced hundreds of logout messages in the log?

4 A. No.

5 Q. And I'm also going to let -- represent to  
6 you that our expert has testified that on -- he  
7 visited again to the warehouse on August 25th, and  
8 that you were working on a problem that day, so  
9 perhaps it's -- you know, perhaps it's the  
10 adjudication problem you were talking about. Maybe  
11 not.

12 But he observed you working on a problem, he  
13 said, and he said that you compared logs from  
14 August 25th to the logs from August 11th.

15 Does that sound familiar to you?

16 A. No.

17 Q. So you don't have any recollection of that?

18 A. No.

19 Q. Were you present on August 11th at around  
20 6:50 a.m. in the morning at the warehouse?

21 A. 6:50? Yes.

22 Q. What were you doing there so early?

23 A. So early in the morning, I know election day  
24 it's mandatory for me to be at the Fulton County  
25 warehouse or whatever county I was allocated to -- in

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9/4/2020

1 case something happens. Because they are going to  
2 open polls, and if they have questions about the  
3 machines, I need to be around to answer them.

4 Q. Was anyone else from Dominion there that  
5 early that day?

6 A. Correct. Yeah. The lady was there.

7 Q. But she didn't tell you to what she was  
8 doing?

9 A. She introduced herself, she said her name,  
10 but, again, I'm bad with names. So she introduced  
11 herself and, you know -- and she told me why she was  
12 there.

13 And I took her over to Derrick's -- no. I  
14 think she met Derrick earlier that -- I took her  
15 again to Derrick's office for Derrick to know, and  
16 Derrick told me she -- she's met her -- like, he's  
17 met her, yeah, so...

18 Q. So she -- I'm sorry. She did or did not  
19 tell you why she was there?

20 A. She did tell me why she was there. She told  
21 me she was there for adjudication and if I need help  
22 with anything. And I asked her if she was local,  
23 like -- she said no.

24 So I figured, all right, she wouldn't be of  
25 much help to me because most of the errors I would be

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1 having on that day would be probably at the  
2 precincts, so I needed someone who could drive around  
3 and know.

4 Q. Did you understand her position within  
5 Dominion?

6 A. No. No.

7 Q. So you don't know if senior or junior or --

8 A. No, no. I do not, no.

9 Q. But she said she was there for adjudication,  
10 and she was there at 6:50 in the morning through the  
11 evening?

12 A. Correct. No. She -- 6:50, I'm not sure  
13 about what time she got in, but she was there early.  
14 Like when everyone was there, she was there.

15 Q. So when you were there in the morning -- and  
16 I -- I'm actually really interested in that time  
17 period, 6:50, 6:55, that early in the morning because  
18 there was a lot of activity in the log files around  
19 then.

20 So did anything noteworthy occur around then  
21 that you are aware of?

22 A. I don't recall. I don't. I don't recall.  
23 But if 6:50 -- for anything in the morning, I would  
24 have been the one to log into the server at that  
25 time.

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9/4/2020

1 Q. Would that -- would that be you logging into  
2 the server --

3 A. Correct.

4 Q. -- to the EMS server?

5 A. Correct.

6 Q. And why would you be logging into the EMS  
7 server? Just to turn it on or what?

8 A. Oh, not the EMS server. The EMS workstation  
9 that's attached to the server, not the --

10 Q. Okay.

11 A. So, yeah.

12 Q. So you would be logging into a client of the  
13 EMS server?

14 A. Correct.

15 Q. And does the server run 24/7 or is it ever  
16 turned off?

17 A. Not off, no. It runs. No. It keeps  
18 running, yeah.

19 Q. So it's always running?

20 A. Correct.

21 Q. And what would you have logged in that early  
22 in the morning for on a client? What would you have  
23 needed to log in for?

24 A. Questions. There might be questions to know  
25 what precinct -- most of -- in Fulton County we have

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1 precincts. We call them splits. We have like two or  
2 three precincts join --

3 THE REPORTER: Slow down. Thank you.

4 THE WITNESS: Sorry.

5 So in Fulton County, we have like three  
6 or four precincts combined, so we call them  
7 a split.

8 So they might want to know probably 07F,  
9 is that the first -- like, the first  
10 precinct on the list. Then I need to tell  
11 them what split was -- other precincts that  
12 was attached to that 07F.

13 So I had to log into the server, check  
14 the database, and give them the answer,  
15 yeah.

16 BY MR. MCGUIRE:

17 Q. So you basically want to be ready in case  
18 calls come in --

19 A. Correct.

20 Q. -- from these places?

21 A. Correct.

22 Q. Would you be surprised to hear that the logs  
23 indicate to Mr. Hursti that remote access was enabled  
24 in the morning that day to the server?

25 A. That would be a big surprise to me. No. A

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9/4/2020

1 very big surprise.

2 Q. Would you have any explanation for that or  
3 any way to imagine why that could be explained?

4 A. No.

5 Q. If you see errors in the log that -- I know  
6 you say you don't necessarily understand everything  
7 in the log, but if you were to see errors that  
8 indicated access denied, what would that suggest to  
9 you?

10 A. Access denied. Maybe you put in the wrong  
11 password.

12 Q. Do you remember yourself putting in the  
13 wrong password when you tried to log in?

14 A. Yes.

15 Q. Did you do it that morning?

16 A. Possibly, yeah.

17 Q. Do you log in every day or just rarely?

18 A. Sometimes multiple times in a day. Multiple  
19 times.

20 Q. So do you have your passwords memorized?

21 A. Sometimes it comes to me, but most of the  
22 time I have to go get the password.

23 Q. So do you store those on paper or how do you  
24 store those?

25 A. On paper. It's a memo.

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1 Q. And where is the memo kept?

2 A. It's in a secure drawer just by the  
3 workstation.

4 Q. Is that locked?

5 A. Yes.

6 Q. And who else has the key besides you to that  
7 drawer?

8 A. The assistant Fulton County warehouse  
9 manager.

10 Q. Anybody else?

11 A. Not to my knowledge.

12 Q. Would you have any reason or any way of  
13 explaining if the log files showed that Windows  
14 Remote Management services were started in the  
15 morning on August 11th?

16 A. That would be -- August -- no, that would be  
17 a surprise. No. I'm surprised.

18 Q. What are Windows Remote Management services?

19 A. I don't know.

20 Q. Okay. Do you have any -- have you ever  
21 encountered anything by that name before?

22 A. No.

23 Q. So what about -- I understand as well that  
24 there was an issue with the server on August 11th  
25 where the server showed that the Windows version --

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9/4/2020

1 there's a screen that showed the Windows version for  
2 the server had not been activated.

3 Do you recall that?

4 A. No, I do not.

5 Q. So you don't recall coming back to the  
6 server at some point and seeing a screen that said  
7 your version of Windows has not been activated?

8 A. Come again? I didn't know the -- I didn't  
9 hear the first part.

10 Q. Sure. Sorry.

11 So you don't recall coming back to the  
12 server at some point on August 11th and seeing a  
13 screen that said, Your version of Windows is not  
14 activated or something to that effect.

15 A. Oh, you mean on the server?

16 Q. Yes.

17 A. I didn't log into the server on August 11th.

18 Q. Did you see anything like that on any of the  
19 client workstations?

20 A. No.

21 Q. So you don't have any recollection of that  
22 at all?

23 A. No.

24 Q. So now I want to turn to the evening,  
25 5:20 -- around 5:20 on August 11th. And I know it's

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9/4/2020

1 hard to keep track of specific times, but sort of --  
2 this would have been after, I guess, the polls were  
3 closed.

4 What activities took place around that time?  
5 Was there anything going on on the server that would  
6 have caused log entries?

7 A. If I can recall, like, 5:20 I was just -- I  
8 was on my way back home from one of the precincts, so  
9 I was on the road, yeah.

10 Q. So you were not there at the warehouse?

11 A. No.

12 Q. And when did you get back from the precinct  
13 on August 11th, around that time?

14 A. Yeah. If I'm correct, it was about 6:00,  
15 close to 6:00. 6:00 or close to 6:00, yeah. Or even  
16 after 6:00. I'm not sure. Yeah. Because I  
17 remember -- yeah.

18 Q. And when did you leave the warehouse to go  
19 out that day?

20 A. It was -- I went out a couple of times. So  
21 the last time was around, I think, 3:30 or so, yeah.

22 Q. And is that -- so you were gone -- left at  
23 3:30, and came back around 6:00?

24 A. Yeah.

25 Q. And you weren't at the warehouse between

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9/4/2020

1 those hours?

2 A. Yes. I'm not sure about if it was 3:00  
3 because I had to drive -- I went to very far places,  
4 two far places, like one in the north and another one  
5 in the south, so...

6 Q. So to the best of your recollection, though,  
7 when were you -- when were you out from the warehouse  
8 on that trip?

9 A. On that trip? I will say for sure 5:00 p.m.  
10 I was not in the warehouse.

11 Q. You were not in the warehouse at 5:00 p.m.?

12 A. No, I was not in the warehouse at 5:00 p.m.

13 Q. And what about 30 minutes on either side of  
14 that? Were you -- was it -- were you gone then?

15 A. Yeah. 5:30, no. Because the minute I go  
16 back to the warehouse, I start preparing for --  
17 for -- to close out advanced voting sites. So I'm  
18 sure that was probably close to, like, 6:30.

19 Q. So when you came back from the precinct  
20 around that time on August 11th, did you see any of  
21 your Dominion colleagues working on the server or on  
22 the workstations?

23 A. The workstations, yes.

24 Q. Who was doing what?

25 A. Like I said earlier, they had -- I noticed

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9/4/2020

1 they had adjudication on the workstations. And the  
2 lady and Brad, they were doing adjudication. I can't  
3 recall who was there, but I know Brad and the other  
4 lady was there.

5 Q. And do you know what they were doing?

6 A. Like I said, on the screen, it was  
7 adjudication on the screen, so...

8 Q. For both of them?

9 A. No. Just one -- we have, like, three  
10 screens for -- three workstations for adjudication.  
11 So the screens weren't on, but they were there.

12 Q. And had the -- had the data from the USB --  
13 had the USB sticks from the Central scanner arrived  
14 yet at that time?

15 A. Must have been, yeah.

16 Q. What about the CompactFlash cards from the  
17 precincts?

18 A. No.

19 Q. Or the polling places?

20 A. No.

21 Q. No?

22 A. No.

23 Q. Did you happen to see any of the screens?

24 Did you see any ballot images on any of the screens  
25 they were working on?

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9/4/2020

1           A. I can't recall, but I knew it was  
2 adjudication. But I know I saw -- the screen for  
3 adjudication is different. When you see it, you know  
4 it's something you've never seen, yeah, so...

5           Q. And that's what they were doing?

6           A. Yes.

7           Q. And were any Fulton County people or any  
8 vote review panel people there or was it just the  
9 Dominion people?

10          A. Yeah. Like I said, they had people. I  
11 wasn't even sure they were -- I can't recall right  
12 now if they were review panel or Fulton County. I  
13 can't recall, you know, yeah.

14          Q. And this is on the -- on August 11th, the  
15 runoff night?

16          A. Yeah.

17               MR. MCGUIRE: What I would like to do is  
18 take a break at this point and just  
19 double-check some stuff.

20               And so I've got one o'clock. I know you  
21 guys have been going since before lunch. Do  
22 we want to have a short lunch break and then  
23 resume?

24               (Discussion ensued off the record.)

25               (Recess from 1:04 p.m. to 1:46 p.m.)

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9/4/2020

1 BY MR. MCGUIRE:

2 Q. Okay. Mr. Olomo, welcome back. And you  
3 understand you're still under oath; correct?

4 A. Right.

5 Q. So I have just some follow-up questions to  
6 ask. First, I wanted to just talk to you about the  
7 logs.

8 Now, you talked about the EMS server logs,  
9 the software running on the EMS server creates logs  
10 in Windows on that computer; right?

11 A. Correct.

12 Q. Now, there are also five workstations and  
13 the ICC computer that are all connected to that  
14 server; right?

15 A. Correct.

16 Q. Do the workstations and the ICC computer  
17 themselves have logs?

18 A. They should have logs, but I've never tried  
19 pulling from those workstations.

20 Q. So you didn't look at pulling those logs  
21 when you pulled the logs Derrick Gilstrap asked you  
22 for?

23 A. No because he specifically stated EMS  
24 server.

25 Q. So those other computers are connected to

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Deposition of  
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9/4/2020

1 the EMS server; right?

2 A. Correct.

3 Q. Now, to your knowledge, do those -- do the  
4 logs on those client computers and the -- and the ICC  
5 computer, are they synchronized with the log on the  
6 server or not?

7 A. Now, it should because they are connected to  
8 it.

9 Q. So do you -- would you expect to see log  
10 entries from activity on a client computer show up on  
11 the server log?

12 A. (No response.)

13 Q. So I think we might have just cut out here.

14 A. You're breaking up in the first part.

15 Q. Yeah. Let me ask you again.

16 A. Yeah.

17 Q. So would you expect to see activity on the  
18 client computer show up in the log on the server  
19 hardware?

20 A. Yeah. Correct. Yeah.

21 Q. You would. Okay.

22 So if it's not there, what would that mean  
23 to you?

24 A. When you mean -- actually, that would be  
25 login activities; right? Like logging in and trying

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9/4/2020

1 to access the server?

2 Q. Well, let's say -- let's just say activity  
3 occurring on the client computer. Would any of that  
4 activity be synchronized to the log on the server  
5 computer?

6 A. No. If you're asking about activities, no.  
7 It's going to be saved under the local computer.

8 Q. But if the client is inter- -- if the client  
9 computer is interacting with the server as a  
10 client --

11 A. Yes.

12 Q. -- you'd see those interactions on the  
13 server log; correct?

14 A. Correct.

15 Q. So earlier when we talked about the access  
16 denied errors, you said that they might be from  
17 passwords being mistyped?

18 A. Correct.

19 Q. Is there also a possibility that an access  
20 denied error could result from a client attempting to  
21 do something on the server that it didn't have  
22 permission to do?

23 A. Not to my knowledge.

24 Q. Do you know that it's not possible or do you  
25 just not know?

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9/4/2020

1 A. I don't know.

2 Q. So when you pulled the logs for Mr. Gilstrap  
3 at his request, you said you used the Event Viewer on  
4 the server machine; correct?

5 A. Correct.

6 Q. So when you use the Event Viewer on that  
7 machine to view logs, you're logged in as an  
8 administrator on the server; right?

9 A. Correct.

10 Q. So that means you have permission to do  
11 anything that can be done on that server?

12 A. Correct.

13 Q. So when you use the Event Viewer as an  
14 administrator, are you able to delete individual log  
15 entries?

16 A. No.

17 Q. Do you know that for a fact or are you -- I  
18 mean, is that -- do you know that for a fact?

19 A. Yeah. I didn't delete nothing.

20 Q. Oh, no, no. I'm not asking whether you did  
21 do it.

22 A. Oh.

23 Q. I'm asking whether an administrator who's  
24 viewing a log through the Event Viewer can delete  
25 individual log entries?

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9/4/2020

1 A. Yeah. I wouldn't know, no.

2 Q. And when you're logged in as an  
3 administrator, can you delete the log file  
4 altogether?

5 A. No. I wouldn't know.

6 Q. So you wouldn't know the answer to that?

7 A. Yeah, no.

8 Q. If you had to -- if Mr. Gilstrap were to ask  
9 you to pull the client logs, what would you have to  
10 do?

11 A. It's the same process. I will go to the  
12 individual workstations and pull the logs.

13 Q. Now, you said that the client computers are  
14 all connected via an Ethernet cable through an  
15 Ethernet hub to the server; right?

16 A. Correct.

17 Q. Does anyone ever plug devices into the  
18 client computers that are outside the rack like USB  
19 sticks, CF cards or anything else? They have ports  
20 for those devices; right?

21 A. Correct.

22 Q. So does anyone ever plug anything, to your  
23 knowledge, into those ports?

24 A. Yes.

25 Q. Like what kinds of things?

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1           A. Like you said, CF cards -- card reader, CF  
2 card reader, like you can, like, upload the results  
3 on election day or during L&A you can use one of the  
4 workstations to load results.

5           And just like the USB, when we print results  
6 from the Central scanner, you transfer those results  
7 using the USB. So we plug in the USB to one of those  
8 workstations to upload those results in the RTR.

9           Q. And so those are devices that are -- storage  
10 devices that are used to transfer vote-related  
11 information; correct?

12          A. Right.

13          Q. Are there any other -- are you aware of any  
14 other devices ever plugged into those computers?

15          A. No.

16          Q. You're not there 24/7, though, are you?

17          A. No, I'm not.

18          Q. So it's possible that someone when you're  
19 not there could plug a device into those client  
20 workstations; is it -- isn't it?

21          A. To the best of my knowledge, no.

22          Q. What would stop them?

23          A. No. I'm saying, like, for me witnessing it,  
24 no.

25          Q. So you've never seen it happen; right?

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Curling v.  
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Deposition of  
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9/4/2020

1 A. I've never seen it happen, yeah.

2 Q. And -- but if you're not there, it's  
3 possible that it could happen?

4 A. Again, to the best of my knowledge, no.

5 Q. So what you're saying is, to the best of  
6 your knowledge, it hasn't happened; right?

7 A. I wouldn't say that -- to the best of my  
8 knowledge, no, no.

9 Q. So I'm just trying to distinguish between  
10 what you've seen, which I know is nothing because  
11 you've said that --

12 A. Yeah.

13 Q. -- and what could happen, which that's what  
14 I'm trying to get at.

15 And what would stop somebody from being able  
16 to plug something into one of those client  
17 workstations when you're not around?

18 A. I'll say nothing, but -- yeah, nothing.  
19 Nothing is going to stop a person, yeah. It's a port  
20 you can easily -- yeah.

21 Q. You can easily plug something into it?

22 A. Yes.

23 Q. Now, besides Derrick Gilstrap, did anyone  
24 give you any instructions on what logs to pull on  
25 those two occasions that you pulled them on -- at

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9/4/2020

1 Mr. Gilstrap's suggestion?

2 A. No.

3 Q. So did anyone from Dominion have any  
4 involvement with that process at all?

5 A. No. I only -- I only reached out to  
6 Dominion for permission to pull those logs.

7 Q. And did you do that both times?

8 A. Yeah, the first time. No. Just the first  
9 time.

10 Q. The first time when you pulled it from the  
11 beginning of time to August 11th?

12 A. Yes.

13 Q. And then the second time you didn't ask  
14 Dominion about it?

15 A. No.

16 Q. And why not the second time?

17 A. Because they are asking for the same  
18 information. They just -- they just want -- I didn't  
19 understand what was required of me the first time,  
20 so...

21 Q. And did anyone from Dominion the first time  
22 you asked give you any instructions about how to do  
23 it or what to do or anything like that?

24 A. Yeah. I'll say -- yeah. They just gave me  
25 advice on how to go about it, but yeah.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 Q. And what did they say how you should go  
2 about it?

3 A. No. But I think there was -- I don't want  
4 to because I can't really recall because they asked  
5 for -- the very time Derrick asked me to pull the log  
6 file, he was also requesting for ballot images.

7 Q. Okay.

8 A. So I don't recall which one of those like  
9 Dominion talked me through to get those images, This  
10 is where you need to find those images or the log  
11 files. But I don't think I had help, you know,  
12 pulling the log files. It's what I can do. But the  
13 images, that's Dominion's application. They need to,  
14 like, let me know how to go about it that.

15 Q. So when you say you called Dominion, you --  
16 to -- you -- in response to Mr. Gilstrap asking you  
17 to pull the log files --

18 A. Yeah.

19 Q. -- you don't think you -- you do or you  
20 don't think you talked to them about the log files?

21 A. I did talk to them about the log files, but  
22 your question was did they talk me through it, like  
23 how to pull the log files, that I didn't -- because  
24 they had -- Mr. Derrick asked me two different  
25 questions about the log files and then to pull file

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 images.

2 So I can't recall if it's -- I was -- I got  
3 help from Dominion on how to pull those images not  
4 the logs because I could pull the logs myself.  
5 That's a Windows thing.

6 Q. So did anyone from Dominion ask to review  
7 the log files before you gave them to Mr. Gilstrap?

8 A. No.

9 Q. And did anyone from Dominion review them  
10 after you gave them to Mr. Gilstrap?

11 A. No.

12 Q. And the first time I think you said  
13 Mr. Gilstrap gave the USB stick with the log files to  
14 whoever had requested them, which was our expert.

15 A. Yeah.

16 Q. But the second time, were you the person who  
17 handed the USB drive to Mr. Hursti?

18 A. No. I gave it to Derrick.

19 Q. And did he not give it back to you and you  
20 then you gave it to Mr. Hursti?

21 A. No.

22 Q. You don't recollect that?

23 A. No. No.

24 Q. I just want to also confirm my understanding  
25 of the layout of the warehouse and where the rack is.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1           So you testified that the rack -- that the  
2 server and an ICC computer, and I believe that's it,  
3 were kept inside the rack; correct?

4           A. Correct.

5           Q. And the rack is not locked. It's closed,  
6 but it's not locked; correct?

7           A. (Audio distortion.)

8           Q. I'm sorry. You're cutting out.

9           A. Yeah. It had the lock -- can you hear me?

10          Q. I can now. Let me ask again.

11                So you testified earlier that the rack is  
12 closed but not locked; correct?

13          A. Correct.

14          Q. And the rack is kept inside the warehouse in  
15 what you refer to as a room. I just want to  
16 understand better.

17                Is the room a walled-off enclosure within  
18 the warehouse or is the room the space within the  
19 warehouse?

20          A. Okay. To explain this better, I believe  
21 this is more like a Fulton County question.

22          Q. Okay.

23          A. But, yeah, like I explained to you the first  
24 time, it's a room within the warehouse, yeah.

25          Q. And you said people work in the room, and

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 they enter and exit it without keys; correct?

2 A. What you mean, "keys"? Because the door --  
3 it has the door, and when you want to come in, you  
4 have a sign-in sheet. You walk in and you walk out.

5 Q. So people walk into this room through a  
6 door, which has a sign-in sheet, but the room itself  
7 is -- I mean, how large -- how large is it? What can  
8 you compare it to in size?

9 A. I'll say an airplane hangar warehouse.

10 Q. So it's about the size of an airplane  
11 hangar?

12 A. Yes, warehouse; right.

13 Q. And that's the room that the cage is kept  
14 in, the server cage?

15 A. Correct.

16 Q. And that is the room that people enter and  
17 exit through a door with a sign-in sheet?

18 A. Correct.

19 Q. And I understand earlier that that door is  
20 not locked, but people are expected to sign in when  
21 they come in and go out; right?

22 A. During working hours; correct.

23 Q. During working hours; right.

24 Now, you also said that the server passwords  
25 are -- they're hard to remember, so they are kept on

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 paper in a locked drawer; is that right?

2 A. Yeah. Correct.

3 Q. And is that drawer near the rack?

4 A. Yeah. Just by the rack, yes.

5 Q. It's just by the rack.

6 And only you -- only the Fulton County  
7 assistant manager has the key to that?

8 A. Yes.

9 Q. Now, Mr. Hursti has testified that a file  
10 was kept on the server that actually had passwords in  
11 it and that you asked him to delete a photo of that.

12 Is that something you recall?

13 A. Yeah, I recall that. I did it.

14 Q. What -- well, why are passwords stored in a  
15 file on the computer?

16 A. So those files -- first, they shouldn't be  
17 taking pictures. To my understanding, it's secured,  
18 but I can't say -- I can't stop them from doing --  
19 taking pictures. That's Fulton County. They  
20 shouldn't be taking pictures.

21 And why those passwords were saved under --  
22 that wasn't the password to get into the server or  
23 the workstation. Those are passwords to get into the  
24 project.

25 Q. Into the project?

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1           A. Yeah. It's because typing in those  
2 passwords, most of the time they're a headache, so I  
3 just put them on -- what you call -- on a notepad,  
4 and it's right there on one of the drives.

5           Q. And what is the project that that's a  
6 password to or that the passwords go to?

7           A. That's for the training project.

8           Q. So to -- so each project within -- each  
9 project that the server has has its own password?

10          A. Correct.

11          Q. And so the passwords that were on the screen  
12 during Mr. Hursti's visit were not the server  
13 passwords you're saying?

14          A. No.

15          Q. They were passwords just to whatever project  
16 you were looking at?

17          A. Correct.

18          Q. And where did you write that down into the  
19 notepad file from? Was it from the paper in the  
20 drawer?

21          A. No. It was from -- yeah, it's a memo,  
22 but -- so when you have -- and each election, when  
23 the database comes in, it comes in with a password  
24 for that project.

25                 So -- but after I, you know, pull the

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 project and everything comes right, I give it back to  
2 Derrick.

3 Q. And so -- and that comes from Fulton County  
4 with a password?

5 A. Yes. Right.

6 Q. They are the ones who create the project and  
7 create the password?

8 A. I wouldn't say yes to that. I don't know.

9 Q. Do you know who does?

10 A. I don't.

11 Q. But it comes from Fulton County to you  
12 already set up?

13 I think you've frozen.

14 Is that correct?

15 A. You were breaking up a lot.

16 Yes. Yeah.

17 Q. So I'll ask again.

18 A. Can you repeat the question?

19 Q. Sure.

20 So the project comes to you with a password  
21 already created, and it comes from Fulton County?

22 A. Correct.

23 Q. So when you -- when you -- I just want to  
24 cover one other issue, which is loading the

25 CompactFlash results that come in from the precinct

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 polling places on election night.

2 A. Correct.

3 Q. You said that you only upload results when  
4 you do that?

5 A. Correct.

6 Q. Now, when you put in the CompactFlash card  
7 and you're doing this in a client workstation, a menu  
8 is displayed, yes?

9 A. Correct.

10 Q. And the menu gives you options to load, it  
11 gives you checkboxes for what you want to load;  
12 right?

13 A. Correct.

14 Q. And one of the checkboxes is results only,  
15 one is images, and one is audit logs; right?

16 A. Correct.

17 Q. And this is when you're dealing with the  
18 CompactFlash cards, yes?

19 A. Correct.

20 Q. So has anyone told you to only select to  
21 upload results? Is that a policy that someone has  
22 communicated to you?

23 A. No. The -- during training, that was how I  
24 was trained. I wouldn't go further or try to  
25 experiment on what I wasn't trained. This is -- it's

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Deposition of  
DOMINIC OLOMO

9/4/2020

1 a live election.

2 Q. Yeah.

3 So your training was to not upload images or  
4 audit logs?

5 A. No. No one told me not to, but I wasn't  
6 trained like that. During training, no one checked  
7 that box, so I didn't check it.

8 Q. So in training, they only checked the  
9 results box?

10 A. Correct.

11 Q. And so that's what you do?

12 A. Correct.

13 Q. But you're not under instructions to only  
14 upload results?

15 A. No. No one told me that, no.

16 Q. If you wanted to upload images and audit  
17 logs for all of the precinct scanners, would you know  
18 how to do that?

19 A. No, because I wasn't trained that. I would  
20 seek opinion from Dominion.

21 Q. You would -- and who would you call at  
22 Dominion?

23 A. Mitch.

24 Q. Mitch? Okay.

25 And we still don't -- you don't remember

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Curling v.  
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Deposition of  
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9/4/2020

1 Mitch's last name since we started; do you?

2 A. Yeah. I could look through my phone, you  
3 know. But, yeah, his last name is on my phone...

4 Q. Do you want to look through your phone?  
5 Could you do it quickly?

6 A. Yeah.

7 (Witness looking through phone.)

8 THE WITNESS: Keddrell is spelled as  
9 K -- last name K-E-D-D-R-E-L-L.

10 BY MR. MCGUIRE:

11 Q. Sorry. Could you say that one more time  
12 from the beginning?

13 A. K-E-D-D-R-E-L-L.

14 Q. K-E-D-D-R-E-L-L?

15 A. Correct.

16 Q. Mitch Keddrell?

17 A. Yes.

18 Q. Thank you very much.

19 A. You're welcome.

20 Q. And you don't have any information about the  
21 Dominion female worker, do you?

22 A. No.

23 Q. And what about -- let's see. What about  
24 Stephanie, your colleague, Stephanie? Do you have  
25 her last name on your phone?

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Deposition of  
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9/4/2020

1 A. No, I do not. I don't have her number.

2 Q. So you -- you also -- the last thing I  
3 wanted to talk about was the logic and accuracy  
4 testing.

5 You noted that your -- the requirement is to  
6 test each race for each ballot style on each machine;  
7 right?

8 A. Correct.

9 Q. Now, observers have reported that that is  
10 not happening.

11 Are you aware of that not happening?

12 A. Again, like I said, I think L&A, all I'm  
13 there to do is show Fulton County employees how to  
14 use the machine. So how -- the process of doing the  
15 L&A is up to Fulton County employees, and how they  
16 correct it, so that's not --

17 Q. So -- okay. So I thought I -- I thought  
18 earlier you said that sometimes you do part of it and  
19 they do part of it. Is that not right?

20 A. Yeah. I said yeah, I do parts of L&A, yeah.

21 Q. But when you're doing part of it, are you  
22 saying that you have never -- that you always test  
23 each contest for each ballot style on each machine  
24 that you do?

25 A. Okay. So on the process of L&A -- there are

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Raffensperger

Deposition of  
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9/4/2020

1 different stages of L&A. That's -- that's the voting  
2 process. That's the process you're talking about  
3 now.

4 They're different. Like, before that, you  
5 can load the data -- when I say "data," it's not like  
6 the election data, but you load the BMD data on the  
7 ICX. So I do that.

8 I do that and I -- sometimes I just try to  
9 help them select the right precinct because I don't  
10 want the wrong ICX going to the wrong location.

11 So -- but the last time I did, the actual  
12 voting, that was a match, during the match election,  
13 the election never happened. But during the match, I  
14 did print out ballots, and I did it the way that I  
15 was told -- I was taught how to do it.

16 Q. So you did not do L&A for the August 11th  
17 election?

18 A. No. No, I didn't -- (audio interruption) --  
19 no.

20 MR. MCGUIRE: Okay. Okay. I -- I would  
21 like to take just a few minutes to confer  
22 with my experts and clients, but I may well  
23 be done.

24 So if -- Marsi, if I can just go offline  
25 here for just a few minutes, I'll pop back

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 on once I've done that, if that's all right.

2 THE REPORTER: Sure. Sounds good. I'll  
3 be here.

4 MR. MCGUIRE: Okay. I'm going to -- I'm  
5 going to hop off for a moment. I'll be  
6 back.

7 Thank you, Mr. Olomo. I'll be right  
8 back.

9 THE WITNESS: You're welcome.

10 (Recess from 2:10 p.m. to 2:12 p.m.)

11 MR. MCGUIRE: I'm back. So that is all  
12 the questions that we have for the moment.  
13 So I will -- I will turn it over to opposing  
14 counsel in case anyone wants to ask any  
15 questions.

16 And thank you very much, Mr. Olomo, for  
17 your testimony.

18 THE WITNESS: You're welcome.

19 THE REPORTER: Anybody else?

20 MR. CRAWFORD: I don't have any  
21 questions.

22 MR. JACOUTOT: No questions from Bryan  
23 Jacoutot of Taylor English.

24 Loree, I don't know if you have anything  
25 or if you're still on.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 MS. PARADISE: No. I'm good. Thank  
2 you.

3 MS. BURWELL: No questions from Fulton  
4 County.

5 (Remote deposition concluded at  
6 2:13 p.m.)

7 (Signature reserved.)  
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Deposition of  
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9/4/2020

CERTIFICATE

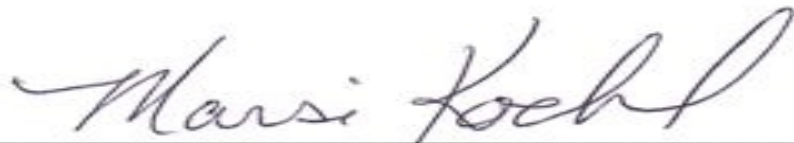
STATE OF GEORGIA:

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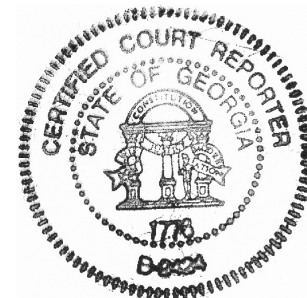
I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions, and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

This the 6th day of September, 2020.



Marsi Koehl, CCR-B-2424



\*\*\*\*\* C E R T I F I E D \*\*\*\*\*

Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

DISCLOSURE

STATE OF GEORGIA:

COUNTY OF DEKALB:

Deposition of DOMINIC OLOMO.

Pursuant to Article 8.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Counsel of Georgia, I make the following disclosure:

I am a Georgia Certified Court Reporter acting as an agent of APG USA, Inc., who was contacted by the offices of THE ROBERT MCGUIRE LAW FIRM, to provide court reporting services for this deposition. I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37 (a) and (b).

APG USA, Inc., has no contract to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to report this deposition. APG USA, Inc., will charge its usual and customary rate to all parties in the case, and a financial discount will not be given to any party to this litigation.

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Date: 9/6/20

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Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONNA CURLING, et al.,	)	
	)	
Plaintiffs,	)	
	)	CIVIL FILE ACTION
vs.	)	
	)	NO. 1:17-cv-02989-AT
	)	
BRAD RAFFENSPERGER, et al.,	)	
	)	
Defendants.	)	

The preceding deposition taken in the matter, on the date, and at the time and place set out on the title page hereof.

It was requested that the deposition be taken by the reporter and that same be reduced to typewritten form.

It was agreed by and between counsel and the parties that the Deponent will read and sign the transcript of said deposition.

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Raffensperger

Deposition of  
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9/4/2020

CERTIFICATE

STATE OF  
COUNTY/CITY OF

Before me, this day, personally appeared, DOMINIC OLOMO, who, being duly sworn, states that the foregoing transcript of his deposition, taken in the matter, on the date, and at the time and place set out on the title page hereof, constitutes a true and accurate transcript of said deposition.

\_\_\_\_\_  
DOMINIC OLOMO

SUBSCRIBED and SWORN to before me this  
\_\_\_\_\_ day of \_\_\_\_\_, 2020 in the  
jurisdiction aforesaid.

\_\_\_\_\_  
My Commission Expires Notary Public

☐ No changes made to the Errata Sheet; therefore, I  
am returning only this signed notarized certificate.

☐ I am returning this signed, notarized certificate  
and Errata Sheet with changes noted.

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

1 DEPOSITION ERRATA SHEET

2 Deponent: DOMINIC OLOMO

3 Deposition Date: September 4, 2020

4 To Reporter:

5 I have read the entire transcript of my deposition  
6 taken in the captioned matter or the same has been  
7 read to me. I request that the following changes be  
8 entered upon the record for the reasons indicated. I  
9 have signed my name to the Errata Sheet and  
10 appropriate Certificate and authorize you to attach  
11 both to the original transcript.

12

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Curling v.  
Raffensperger

Deposition of  
DOMINIC OLOMO

9/4/2020

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Deposition of DOMINIC OLOMO

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